

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF MISSOURI**

MISSOURI NAACP, et al.

Plaintiffs,

v.

Civ. No. 14-2077

FERGUSON-FLORISSANT SCHOOL
DISTRICT and ST. LOUIS COUNTY
BOARD OF ELECTION
COMMISSIONERS,

Defendants.

DECLARATION OF WILLIAM S. COOPER

WILLIAM S. COOPER, acting in accordance with 28 U.S.C. § 1746,
Federal Rules of Civil Procedure 26(a)(2)(B) and 26(e), and Federal Rules of
Evidence 702 and 703, does hereby declare and say:

1. My name is William S. Cooper. I have a B.A. in Economics from Davidson College. As a private consultant, I currently serve as a demographic and redistricting expert for the Plaintiffs. I am compensated at a rate of \$100 to \$150 per hour for my work.

2. I have testified at trial as an expert witness on redistricting and demographics in federal courts in about 35 voting rights cases. Three of these lawsuits resulted in changes to statewide legislative boundaries: *Rural West Tennessee African-American Affairs v. McWherter*, *Old Person v. Cooney*, and

Bone Shirt v. Hazeltine. Approximately 25 of the cases led to changes in local election district plans.

3. Since the release of the 2010 Census in February 2011, I have developed several statewide legislative plans (Alabama, Georgia, Kentucky, Florida, South Carolina, and Virginia) and about 150 local redistricting plans, primarily for groups working to protect minority voting rights. Three plans that I developed for local government clients during 2011 – in Bolivar County, Mississippi; the City of Grenada, Mississippi; and Sussex County, Virginia – were precleared under Section 5 of the Voting Rights Act by the U.S. Department of Justice.

4. In 2013, I served as a redistricting consultant for the Claiborne County, Mississippi Board of Supervisors and the Tunica County, Mississippi Board of Supervisors.

5. In March 2014, I was retained by the City of Decatur, Alabama as a redistricting consultant in *Voketz v. City of Decatur*.

6. Two federal courts have recently granted summary judgment on the first prerequisite (*Gingles I*) of a Section 2 claim pursuant to *Thornburg v. Gingles*, 478 U.S. 30 (1986), based in part on my testimony: *Pope v. Albany County, New York* (N.D.N.Y. Jan. 28, 2014; N.D.N.Y. Mar. 24, 2015), and *Montes v. City of Yakima, Washington* (E.D. Wash. Aug. 22, 2014).

7. In *Montes v. City of Yakima* (E.D. Wash. Feb. 17, 2015) the court adopted, as a remedy for the Section 2 violation, a seven single-member district plan that I developed for the plaintiffs.

8. For more information on my testimony as an expert witness and experience preparing and assessing proposed redistricting maps for Section 2 litigation and other efforts to promote compliance with the Voting Rights Act, see a summary of my redistricting work attached as **Exhibit A**.

9. The attorneys for the Plaintiffs in this case asked me to determine whether it is possible to create four majority-Black districts in a seven single-member district plan for the Ferguson-Florissant School District (“Ferguson-Florissant SD” or “School District”). For background, the attorneys also asked me to review historical and current demographics of the School District (reported in the decennial Census), as well as socio-economic characteristics of African Americans and non-Hispanic Whites (reported in the American Community Survey).

10. In addition, the Plaintiffs’ attorneys asked me to compile population demographics, as reported by the 2010 Census at the census block level, by precinct, for use in the voting analysis performed by Dr. Richard Engstrom in this litigation.

11. As discussed in **Sections III** and **IV** below, I conclude that the African-American population in the Ferguson-Florissant SD is sufficiently numerous and geographically compact to allow for four districts with Black voting-age population (BVAP) majorities in a seven single-member district plan.

I. DEMOGRAPHIC PROFILE OF FERGUSON-FLORISSANT SD

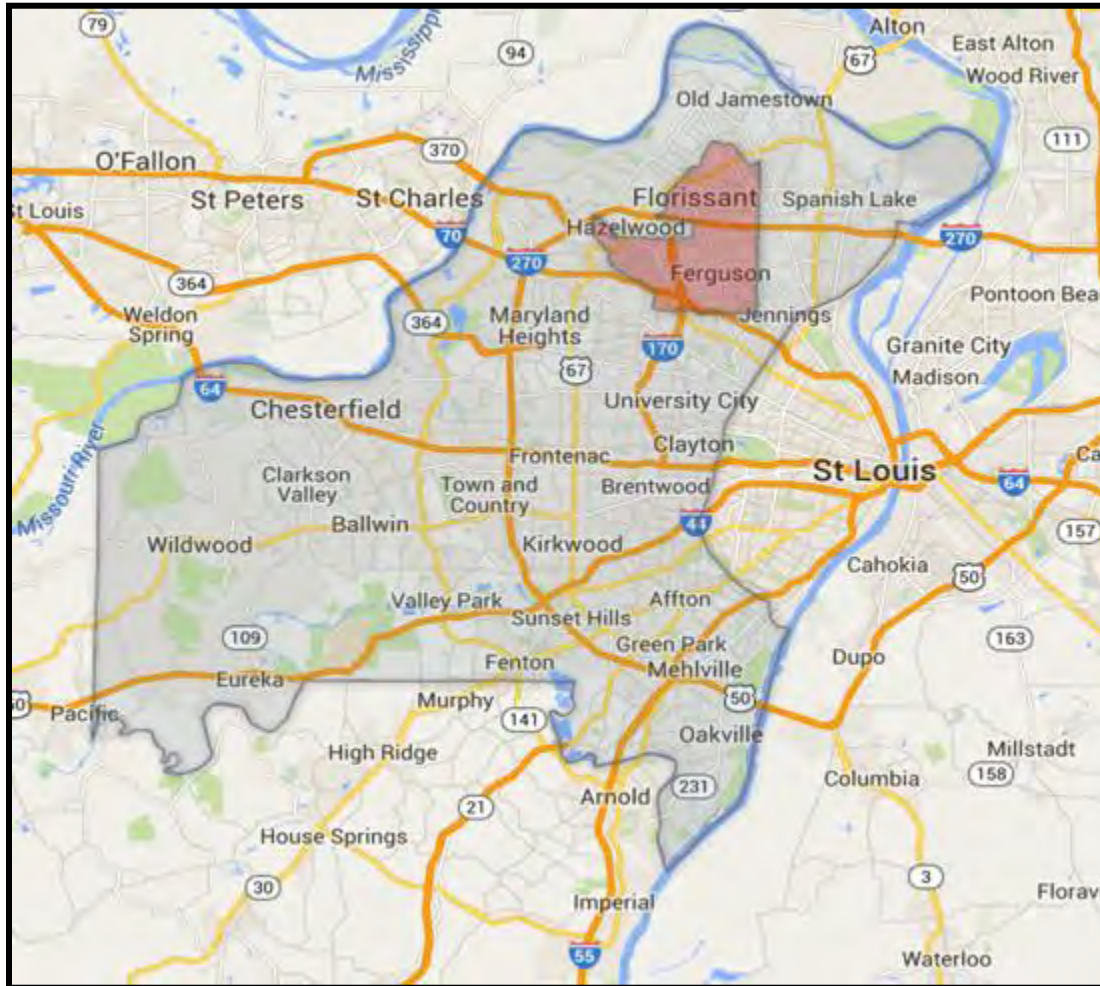
12. The Ferguson-Florissant SD is located in northern St. Louis County, Missouri, a densely populated suburban county (pop. 998,954) that surrounds the City of St. Louis. The School District encompasses all or parts of 11 municipalities and covers a land area of about 25 square miles.

13. There are minor discrepancies in the boundary for the Ferguson-Florissant SD as defined by the U. S. Census Bureau (“Census Bureau”) compared to the boundary for the School District as defined by the St. Louis County Board of Elections (“Board of Elections”). The net effect, according to my calculation, is that the Board of Elections boundary has 387 fewer persons than the 69,050 persons reported by the Census Bureau in the 2010 Census. This has no significant impact on the demographics in the School District, as the percentage point differences by race between the two geographic definitions are under one tenth of a percent.

14. The School District (as defined by the Board of Elections) is shaded pink and St. Louis County is light grey in the regional map in **Figure 1** on the next page.

Figure 1

Ferguson-Florissant School District and St. Louis County



15. The current Board of Elections boundary for the School District must be used for redistricting plan apportionment. Nonetheless, the Census Bureau boundary definition remains relevant because that is how the School District is defined in official decennial Census Bureau datasets, including the American Community Survey. (Also, the 1990 Census Bureau boundary is identical to the

present-day boundary as defined by the Board of Elections.¹⁾

2010 Census – Population by Race, Ethnicity, and Age

16. According to the boundary defined by the Board of Elections and corresponding 2010 Census block-level data, the Ferguson-Florissant SD has a total population of 68,663, with a single-race Black² population of 35,860 (52.23%) and an Any Part (AP) Black³ population of 36,967 (53.84%).

17. The 2010 non-Hispanic White population is 29,581 (43.08%). The 2010 total minority population in Ferguson-Florissant SD is 39,082 (56.92%) – consisting of all persons who are not single-race, non-Hispanic White.

18. In the Ferguson-Florissant SD, African Americans constitute a smaller percentage of the voting-age population than the total population, while the reverse is true for non-Hispanic Whites. Based on the 2010 Census, Ferguson-Florissant SD has a total voting-age population of 50,771, of whom a minority – a

¹ The source for the 1990 School District population data is a nationwide Special Tabulation performed by the Census Bureau for the National Center for Education Statistics. See, for example: <http://nces.ed.gov/surveys/sdds/1990/Master90sd.asp?ID=P008&type=P&age=N&ctynome=N&distid=12010&enroll=N&geotype=02&state=29&table=2PS&univ=2B>

² In this declaration, the terms “Black” or “African American” are used synonymously and include single-race Black Hispanics, unless otherwise noted. “White” refers to single race non-Hispanic White.

³ The Any Part Black classification counts as “Black” all persons who identified in the 2010 Census as single-race Black and all persons who identified as more than one race and some part Black. The AP Black category includes persons who are some part Black and Hispanic. It is my understanding that following the U.S. Supreme Court decision in *Georgia v. Ashcroft*, 539 U.S. 461 (2003), the “any part” definition is an appropriate Census classification to use in most Section 2 cases.

total of 24,030 (47.33%) – are single-race Black, with an AP Black voting-age population of 24,466 (48.19%).

19. Non-Blacks are a majority of the voting-age population in Ferguson-Florissant SD, with non-Hispanic Whites as the largest racial group in terms of voting-age population. The non-Hispanic White voting-age population in Ferguson-Florissant SD is 24,852 (48.95%).

20. The 2010 Census counted a total population of 1,324 (1.93%) Latinos in Ferguson-Florissant SD, of whom 824 (1.62%) are of voting age. Latinos are persons of Hispanic origin or heritage and may be of any race. Based on the 2010 Census, there are 133 persons who identify as single-race Black Hispanic and 80 persons of voting age who identify as single-race Black Hispanic in the School District.

Population by Race and Ethnicity – 1990 to 2010

21. The table in **Figure 2** (on the next page) shows the population of the Ferguson-Florissant SD by race and ethnicity for the decennial Censuses between 1990 and 2010, according to the Board of Elections boundary definition.

Figure 2

**Ferguson-Florissant SD – 1990 Census to 2010 Census
Population and Race Distribution**

	1990 Number	Percent	2000 Number	Percent	2010 Number	Percent
Total Population	80,938	100%	73,350	100%	68,663	100%
Total Hispanics	656	0.81%	918	1.25%	1,324	1.93%
White*	59,995	74.12%	43,583	59.42%	29,581	43.08%
Black*	19,694	24.33%	26,995	36.80%	35,727	52.03%
American Indian and Alaska Native*	126	0.16%	150	0.20%	167	0.24%
Asian*#	402	0.50%	491	0.67%	394	0.57%
Hawaiian and Pacific Islander*#	NA	NA	13	0.02%	14	0.02%
Other*	65	0.08%	115	0.16%	124	0.18%
Two or More Races*	NA	NA	1,085	1.48%	1,332	1.94%
Black (Including Hispanics)	19,783	28.65%	27,095	36.94%	35,860	52.23%
Any Part Black (Including Hispanics)	NA	NA	NC	NC	36,967	53.84%

* Non-Hispanics only

In 1990, “Asian” includes Hawaiian and Pacific Islander.

NA Not available

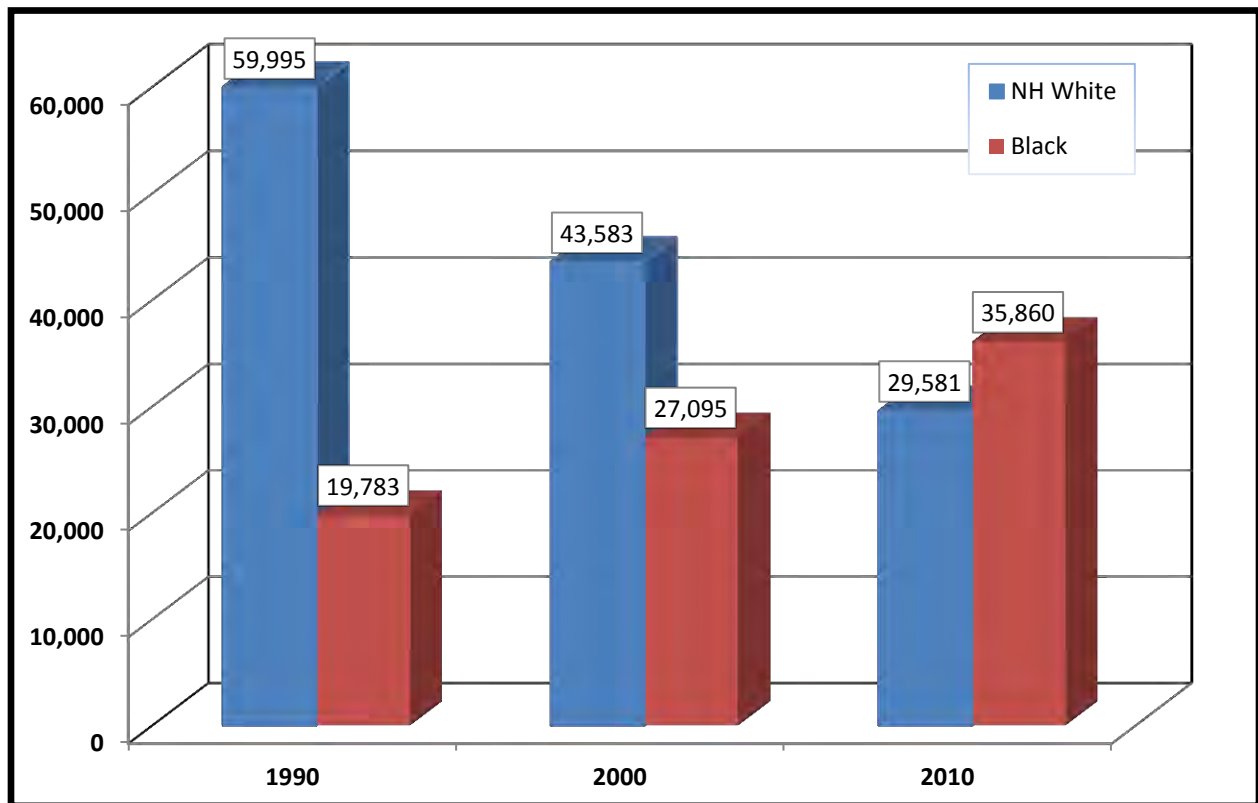
NC Not calculated

22. Since 1990, the Ferguson-Florissant SD has experienced a significant population decline – from 80,938 persons in 1990 to 68,663 in 2010. This represents a loss of 12,275 persons (-15.17%).

23. As shown in the chart in **Figure 3** (on the next page), even as the overall population declined over the 20-year period, the total Black population in the School District increased by 16,077 persons (81.27%) – from 19,783 in 1990 to 35,860 in 2010.

Figure 3

**Ferguson-Florissant SD – 1990 Census to 2010 Census
African-American and Non-Hispanic White Population**



24. **Figure 3** also reveals that the non-Hispanic White population experienced a much sharper decline than the overall population during the 20-year period – dropping from 59,995 in 1990 to 29,581 in 2010. This decline amounted to a loss of 30,414 persons and cut the non-Hispanic White population by half (-50.69%).

25. As the Black population increased in the School District between 1990 and 2010, the Black population percentage climbed – from 28.65% in 1990 to

36.94% in 2000 and then to 52.23% in 2010. By contrast, the non-Hispanic White population percentage fell from 74.12% in 1990 to 43.08% in 2010.

26. For the record, I have reproduced **Figure 2** and **Figure 3**, according to the Census Bureau boundary definition for 1990 through 2010 in **Exhibit B-1**. **Exhibit B-2** is a map showing the boundaries for the 2010 Census voting districts (“VTDs”) with an overlay of the 2011 BOE precincts. On this map, one can discern that the outer boundaries of the School District as defined by Census Bureau VTDs (in red) are slightly different from the BOE definition outlined by precincts (in green).

27. The table in **Figure 4** compares Black and non-Hispanic White voting age population between 1990 and 2010 in the School District, according to the Board of Elections boundary definition.

Figure 4

**Ferguson-Florissant SD – 1990 Census to 2010 Census
Voting Age Population – African-American and Non-Hispanic White**

	1990 VAP Number	Percent	2000 VAP Number	Percent	2010 VAP Number	Percent
Voting Age Population	60,722	100%	53,199	100%	50,771	100%
Non-Hispanic White	47,290	77.88%	34,274	64.43%	24,852	48.95%
Non-Hispanic Black	12,582	20.72%	17,297	32.51%	23,950	47.17%
Single-race Black	12,613	20.77%	17,348	32.61%	24,030	47.33%
Any Part Black	NA	NA	NC	NC	24,466	48.19%

NA Not Available

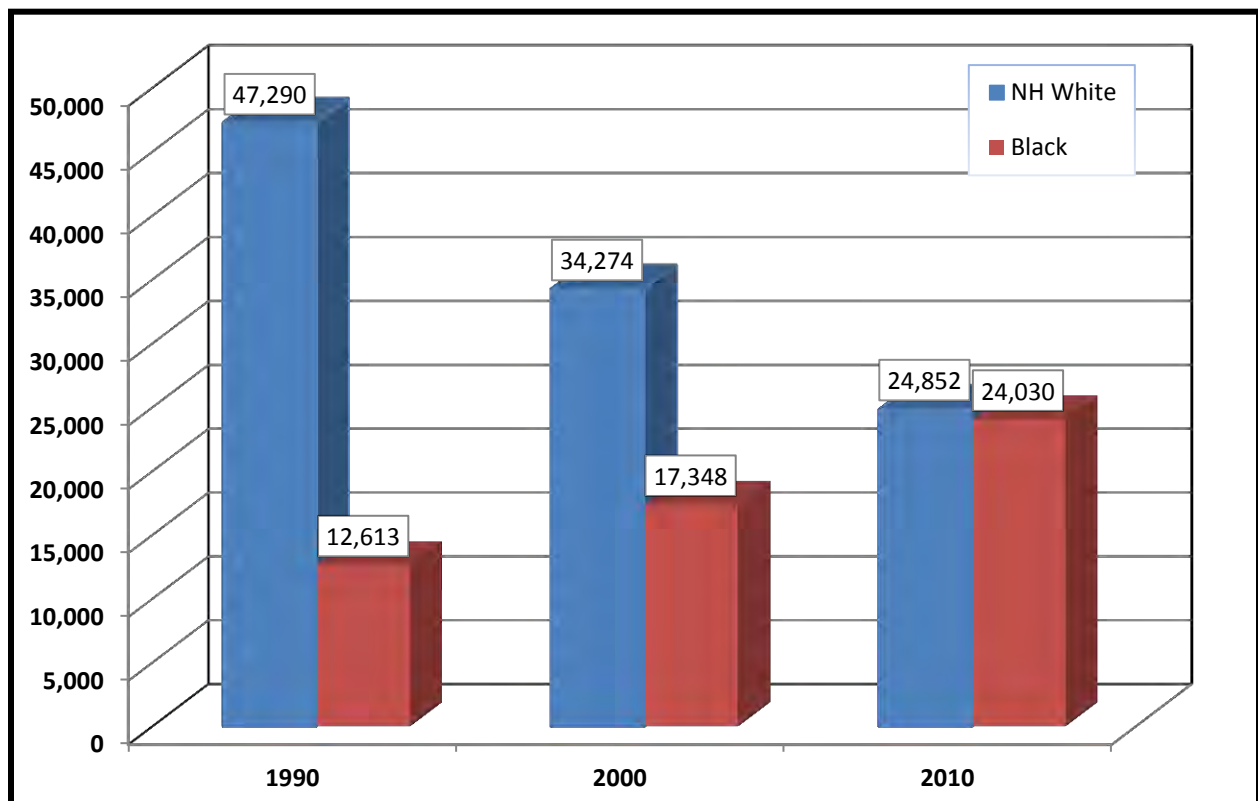
NC Not Calculated

28. Since 1990, the voting age population in the Ferguson-Florissant SD has declined in step with the overall population loss – from 60,722 persons 18 and over in 1990 to 50,771 in 2010. This represents a loss of 9,951 persons (-16.39%).

29. As shown in the table in **Figure 4** and chart in **Figure 5**, the non-Hispanic White voting age population dropped from 47,290 in 1990 to 24,852 in 2010 – a loss of 22,438 persons (-47.45%).

Figure 5

**Ferguson-Florissant SD – 1990 Census to 2010 Census
African-American and Non-Hispanic White Voting Age Population**



30. Non-Hispanic Whites comprised a substantial majority of the voting age population (77.88%) in 1990. By 2010, a plurality of the voting-age population – approximately 48.95% – was non-Hispanic White.

31. The African-American voting age population nearly doubled between 1990 and 2010 – from 12,613 to 24,030 in 2010. In 1990, the School District was 20.77% BVAP. By 2010 – at 47.33% BVAP – African Americans remained a minority of the voting age population, despite the significant population gain over the two decades.

2010 Population by Place

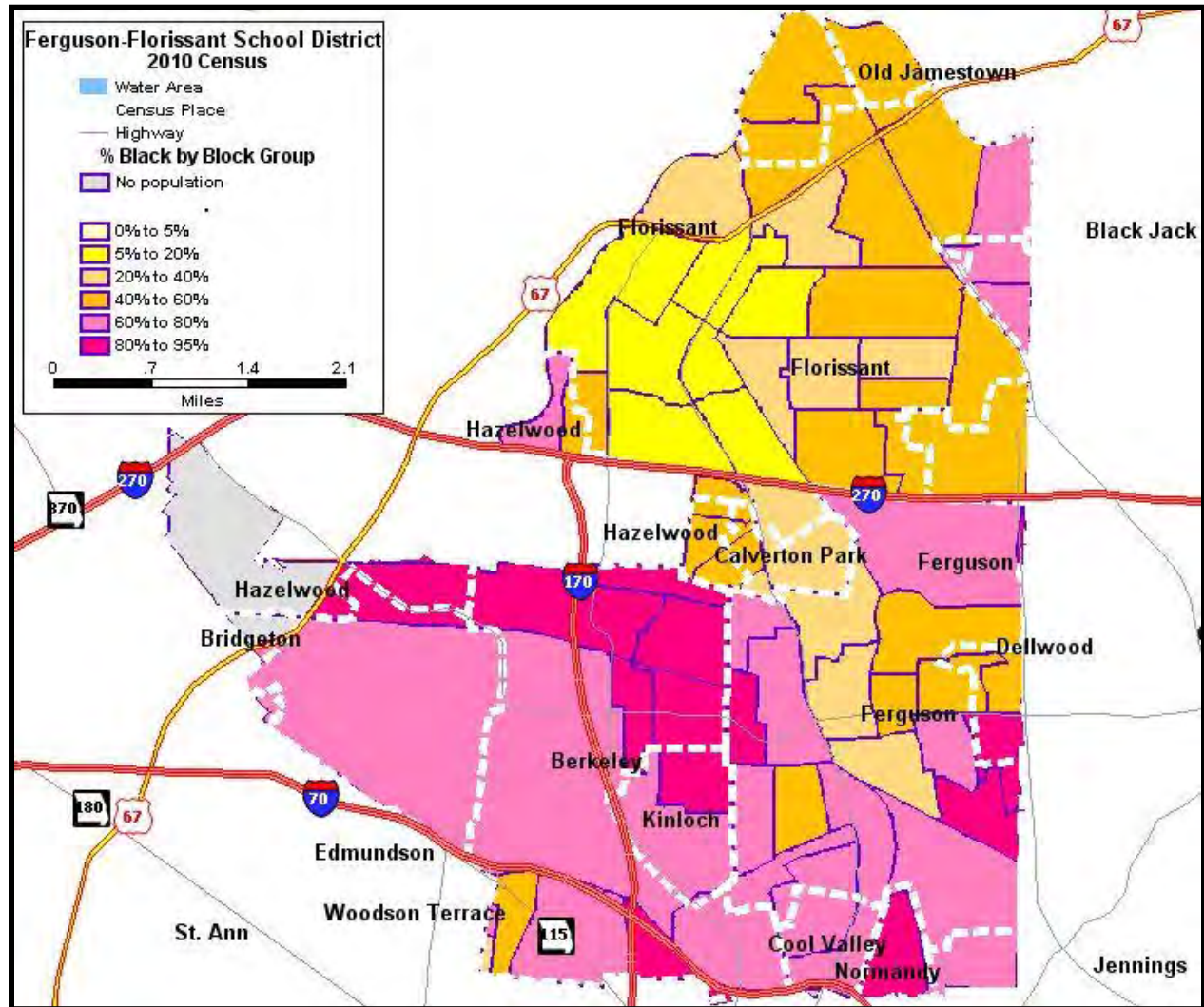
32. There are 11 municipalities that are wholly or partly within the Ferguson-Florissant SD. The table in **Figure 6** (on the next page) reports African-American population counts within the School District based on the 2010 Census for these 11 places. Four municipalities are entirely within the School District – Berkeley, Calverton Park, Cool Valley, and Kinloch.

Figure 6**Ferguson-Florissant SD Population by Place – 2010 Census**

Municipality	2010 Pop. in School District	2010 Black Pop. in School District	% Black	% of Total Pop. in Municipality within District	% of Black Pop. in Municipality within District
Berkeley	8,978	7,346	81.82%	100.00%	100.00%
Black Jack (one block)	4	1	25.00%	0.06%	0.02%
Calverton Park	1,293	546	42.23%	100.00%	100.00%
Cool Valley	1,196	1,011	84.53%	100.00%	100.00%
Dellwood	855	578	67.60%	17.01%	14.53%
Ferguson	17,178	10,571	61.54%	81.02%	73.94%
Florissant	28,538	9,657	33.84%	54.71%	69.19%
Hazelwood	2,983	1,569	52.60%	11.61%	20.03%
Kinloch	298	282	94.63%	100.00%	100.00%
Normandy	1,313	1,118	85.15%	26.22%	32.01%
Old Jamestown	1,129	539	47.74%	5.89%	5.23%

Geographic Compactness of the African-American Population

33. The map in **Figure 7** (on the next page) displays the distribution of the African-American population in the Ferguson-Florissant SD at the block group level, with an overlay of municipal boundaries (white dashed lines). Block groups (purple lines) contain multiple census blocks and often follow neighborhood lines.

Figure 7**Ferguson-Florissant SD – Percent Black by Block Group (2010 Census)**

34. The pink to red areas in **Figure 7** are overwhelmingly African-American neighborhoods (60% or higher). The orange areas are more diverse in the range of 40% to 60%. From the map, it is clear that the African-American population is sufficiently numerous and geographically compact to comprise several majority-Black districts under a seven single-member district plan.

35. A more detailed street-level version of the **Figure 7** map is in **Exhibit C**. The numbers displayed with the labels on the map in **Exhibit C** show the 2010 single-race Black population count by block group (or partial count where block groups are split by the School District boundaries).

II. SOCIOECONOMIC PROFILE OF FERGUSON-FLORISSANT SD

36. Non-Hispanic Whites in the Ferguson-Florissant SD outpace African Americans across a broad range of socio-economic measures, as reported in the 3-year *2011 to 2013 American Community Survey* (released by the Census Bureau in October 2014). This disparity is summarized below and depicted with further detail in charts and tables found in **Exhibit D**.⁴

(a) Income

- Nearly one-fourth (23.0%) of the Black population in the School District lives in poverty, compared to 9.7% of Whites. In addition, over one-third of Black children (36.0%) live in poverty, compared to 19.6% of White children. (**Exhibit D at pp. 17-18.**)
- In the School District, Black median household income is \$38,760 – about 70% of the \$52,781 median income of White households. (**Exhibit D at pp. 19-20.**)
- Black family households (defined by the Census Bureau as households with related persons) in the School District exhibit a similar median income disparity *vis-à-vis* White family households – \$44,099 for Black median family household income compared to \$66,096 for White family households. (**Exhibit D at pp. 21-22.**)

⁴ In this section, “White” refers to non-Hispanic White. There is not a separate category for non-Hispanic Black or Any Part Black in the American Community Survey.

- Reflecting the high Black poverty rate, over twice as many Black households rely on food stamps compared to White households, with 26.8% of Black households participating in the Supplemental Nutrition Assistance Program (SNAP), compared to 10.0% of White households in the School District. (**Exhibit D at pp. 31-32.**)

(b) Employment

- The \$26,671 median earnings level of African Americans working full-time in the Ferguson-Florissant SD is just 83% of the \$32,202 annual median earnings garnered by Whites. (**Exhibit D at pp. 25-26.**)

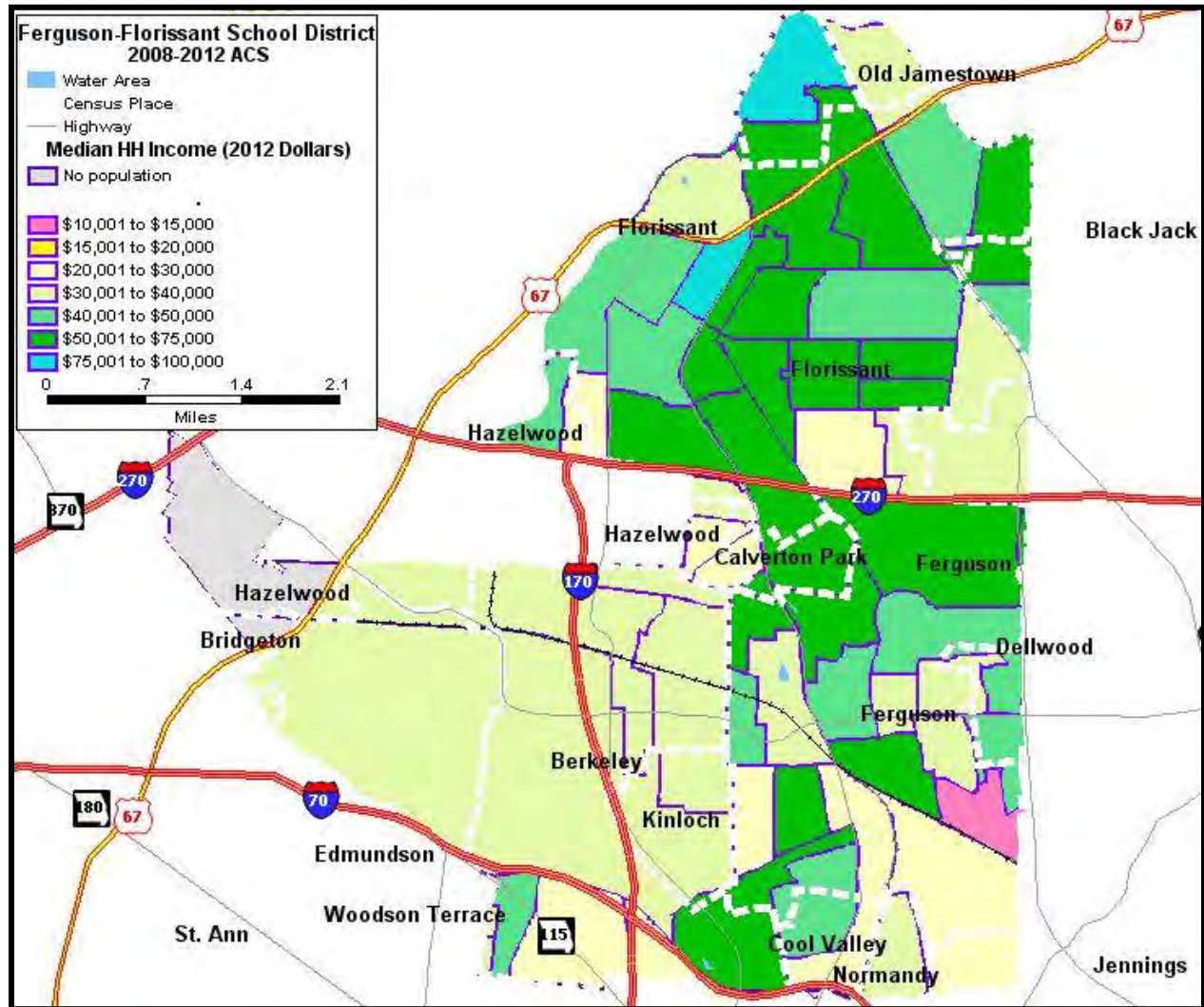
- The Black unemployment rate (for the working-age population ages 16-64, expressed as a percent of the civilian labor force) is several percentage points higher than the rate for Whites. On average, over the course of the 3-year survey, 14.3% of working-age African Americans were unemployed, while 9.9% of their White counterparts were unemployed. (**Exhibit D at pp. 33-36.**)

- Just 24.9% of African Americans in the School District are employed in management or professional occupations compared to 37.2% of Whites. (**Exhibit D at pp. 37-38.**)

(c) Housing

- About one-half of Black households (49.3%) rent their residences, compared to a rental rate of about 15.5% for White households. (**Exhibit D at pp. 39-40.**)

37. The map in **Figure 8** (on the next page) shows median household income for all races by block group in the School District, as reported in the 5-year 2008-12 *American Community Survey* (released by the Census Bureau in December 2013). Most of the predominantly African-American neighborhoods (see **Figure 7** *supra*) are in areas with lower median household incomes.

Figure 8**Ferguson-Florissant SD – Median Household Income (2008-12 ACS)****III. REDISTRICTING****Methodology and Sources**

38. In the preparation of this report, I analyzed population and geographic data from the 1990 to 2010 decennial Censuses and the American Community Survey conducted by the Census Bureau.

39. For my redistricting analysis, I used a geographic information system (GIS) software package called *Maptitude for Redistricting*, developed by the Caliper Corporation. This software is deployed by many local and state governing bodies across the country for redistricting and other types of demographic analysis.

40. The geographic boundary files that I used with *Maptitude* are created from the U.S. Census 1992, 2000, 2010, and 2014 TIGER (Topologically Integrated Geographic Encoding and Referencing) files. The population data are from the U. S. Census 1990, 2000 and 2010 PL 94-171 data files. The PL 94-171 dataset is published in electronic format and is the complete count population file designed by the Census Bureau for use in legislative redistricting. The file contains basic race and ethnicity data on the total population and voting-age population found in units of Census geography such as states, counties, municipalities, townships, reservations, school districts, census tracts, census block groups, precincts (called voting districts or “VTDs” by the Census Bureau) or precinct proxies (called “pseudo-VTDs” by the Census Bureau), and census blocks.

41. The *Maptitude for Redistricting* software processes the TIGER files to produce a map for display on a computer screen. The software also merges demographic data from the PL 94-171 files to match the relevant decennial Census geography.

42. I developed the illustrative plans presented in this report at the census block level using *Maptitude for Redistricting*. A census block is the smallest geographic tabulation area from the decennial Census. A block may be as small as a regular city block bounded by four streets, or as large as several square miles in a rural area. Generally, a census block is bounded on all sides by visible features such as streets, rivers, and railroad tracks.

43. I obtained electronic Geographic Information System (GIS) shapefiles on CD depicting current boundaries for the Ferguson-Florissant SD (and all school districts in St. Louis County) from the St. Louis County GIS Department. Additional geographic shapefiles were available on this CD, including boundaries for the 2014 municipal wards in St. Louis County. These files were mailed to me on CD by the St. Louis County GIS Department.

44. I also obtained GIS shapefiles depicting precincts for the School District (and all precincts in St. Louis County) for the April elections in 2011 through 2014 from the St. Louis County Board of Elections. These files were mailed to me on CD by the Board of Elections. In addition, the Plaintiffs' attorneys gave me a GIS shapefile (via email) depicting precincts in the School District as of April 2015.

45. I used the 2014/2015 precinct shapefiles as overlays (with *Maptitude*) when developing the illustrative plans included in this declaration. In addition, for

the statistical analysis conducted by Dr. Richard Engstrom, I relied on the 2011 through 2015 precinct shapefiles to derive population totals by race (with *Maptitude*) for precincts and consolidated precincts for elections held between 2011 and 2015.

46. In many instances, current and historical St. Louis County precinct boundaries do not precisely match census block geography. Where these minor anomalies occurred, I used the “whole block” criterion employed by the Census Bureau to approximate precinct boundaries. This visual method assigns all of the population in a split census block to the nearest precinct boundary.⁵ The map in **Exhibit B-2** overlays 2011 BOE precincts onto 2010 Census VTDs. The 2010 Census VTDs consistently match 2010 census block geography, while the 2011 (and 2012-2015) BOE precincts do not.⁶

47. As shown in the map in **Exhibit B-2**, areas where there is not a perfect match between the 2011 BOE precincts and census block geography can be

⁵ The Census Bureau describes this method to approximate precinct boundaries as follows: “The entities identified as VTDs are not necessarily those legally or currently established in part because to meet the whole block criterion a State may have had to depict the boundaries of VTDs that split blocks to follow nearby block boundaries the Census Bureau refers to such VTDs as pseudo VTDs.” See *A Guide to State and Local Census Geography*, U.S. Census Bureau, 1993, p.10.

⁶ In some instances, the 2010 VTDs shown in the **Exhibit B-2** map are split by the Census Bureau defined school district boundaries along census block geography (*i.e.*, part of the 2010 VTD is in Ferguson-Florissant School District with the remainder (not displayed) in another school district).

discerned where the red VTD lines are displayed.⁷ In many instances, these discrepancies involve unpopulated census blocks and even where populated census blocks are involved the potential differences in population percentages by race would be minimal between the “whole block” criterion method I used and some other estimation method (*e.g.*, block centroids or proportional land area).⁸

48. The map in **Exhibit B-3** (zooming on 2015 BOE precinct AP038), with realigned precincts color-coded, shows how I modified 2015 BOE precinct boundaries (thick green lines) to match 2010 Census blocks (thin black lines), using the “whole block” criterion. Realigned AP038 is color-coded yellow and follows whole census blocks. The black numbers identify the 2010 voting age population by census block.⁹

49. The Plaintiffs’ attorneys also gave me a list of the home addresses of the seven incumbent school board members. I geocoded these addresses and created a point overlay file for use with *Maptitude*.

⁷ One obvious exception in the **Exhibit B-2** map is where a red line VTD extends west into a populated area that is adjacent to the City of Black Jack (163 persons in two census blocks). These two blocks are entirely excluded from the BOE definition of the School District, so there are no split blocks in that area.

⁸ I used the 2011 BOE precincts for this illustration because subsequent BOE precinct boundary changes due to state and municipal post-2010 redistricting result in differences with VTD boundaries that are not necessarily related to Census block splits.

⁹ April 2015 Precinct APO38 was numbered AP055 in 2011.

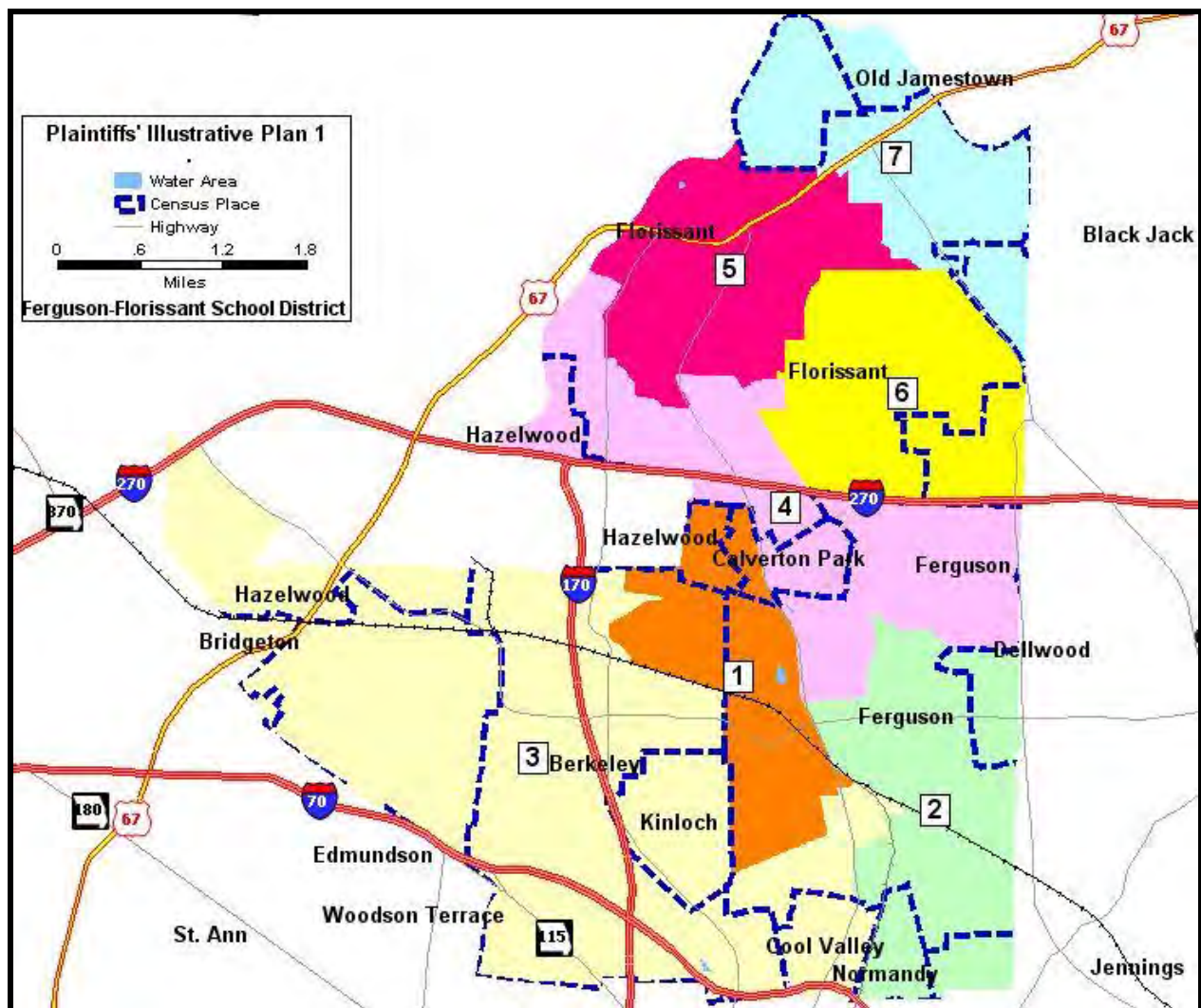
Plaintiffs' Illustrative Plan 1

50. I developed the *Plaintiffs' Illustrative Plan 1* depicted in **Figure 9**.

The plan has seven single-member districts. Four of the districts are majority-Black voting age. **Exhibit E-1** contains a similar map with street detail.

Figure 9

Plaintiffs' Illustrative Plan 1 – Ferguson-Florissant School District



51. The table in **Figure 10** summarizes population statistics by district for *Plaintiffs' Illustrative Plan 1*. The four majority-Black districts range from 52.86% BVAP in District 7 to 74.36% BVAP in District 3. The plan has an overall deviation of 7.18% from the ideal population size of 9,809. (68,663 divided by 7). **Exhibit E-2** contains detailed population statistics for *Plaintiffs' Illustrative Plan 1*.

Figure 10

Plaintiffs' Illustrative Plan 1 – 2010 Census Summary

District	Population	% Dev	% Black	18+ Pop	% 18+ Black	% 18+ NH White
1	9841	0.33%	69.63%	6918	63.93%	32.68%
2	10025	2.20%	66.36%	7071	60.95%	35.75%
3	9923	1.16%	77.64%	6984	74.36%	21.12%
4	9321	-4.98%	30.50%	7406	27.84%	68.09%
5	9997	1.92%	20.33%	7790	17.45%	79.11%
6	9980	1.74%	44.05%	7442	38.94%	57.58%
7	9576	-2.38%	56.18%	7160	52.86%	43.25%

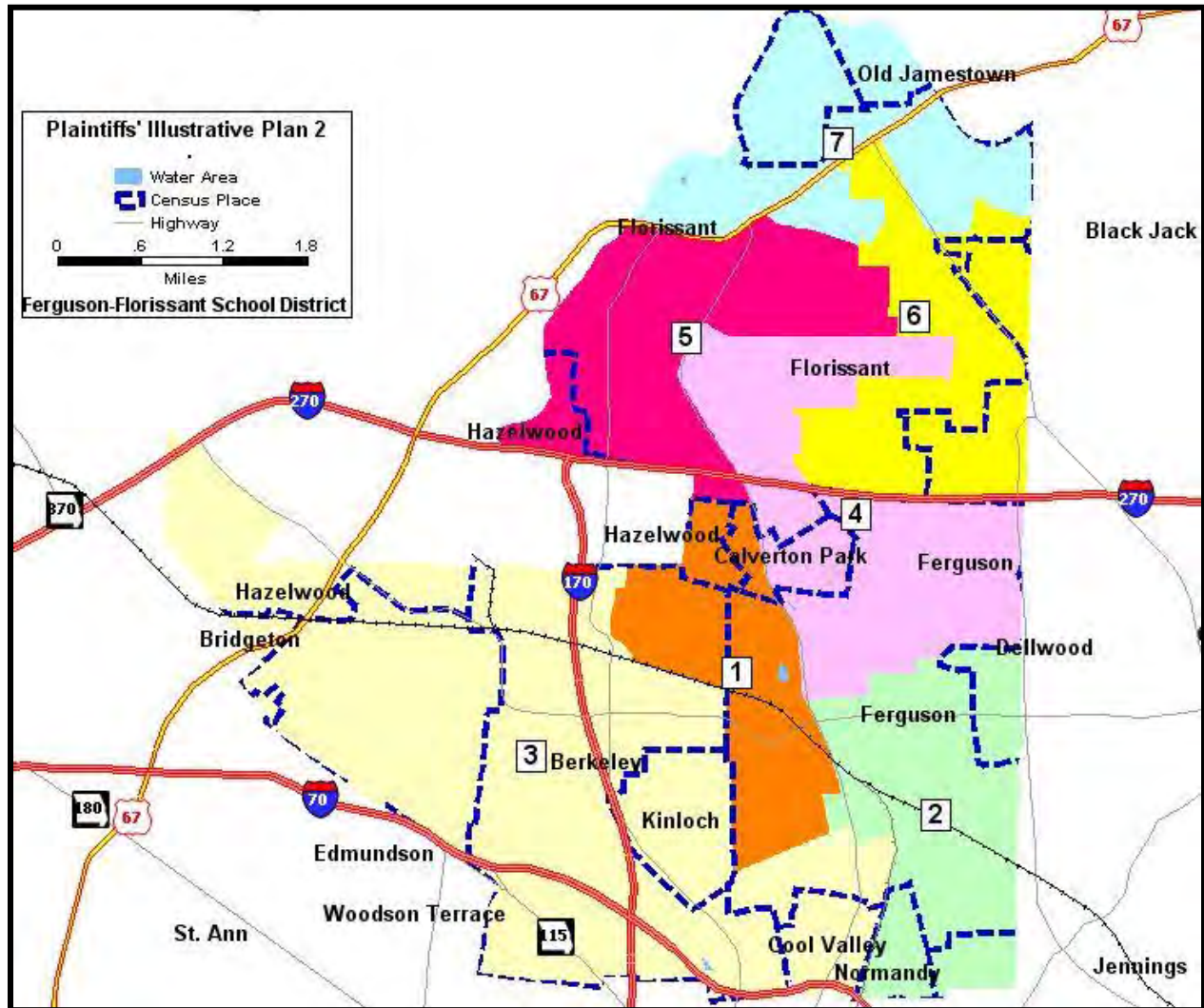
52. *Plaintiffs' Illustrative Plan 1* generally follows 2014 precinct boundaries. (See **Exhibit E-3**.) Three of the 96 precincts¹⁰ in the School District are split by *Plaintiffs' Illustrative Plan 1* district boundaries, with a few additional splits where the affected precincts are split by 2010 Census blocks. No census blocks are split by district boundaries under *Plaintiffs' Illustrative Plan 1*.

¹⁰ Of the 96 precincts in the Ferguson-Florissant School District as of April 2015, 23 are identified as “No Vote Precincts” in the shapefile. There were no votes cast in the 2015 election from these precincts.

53. Public schools are balanced across all seven districts, with each district having two to five schools. (See the map in **Exhibit E-4** and table in **Exhibit E-5**.) *Plaintiffs' Illustrative Plan 1* pairs three incumbents in District 2 and two incumbents in District 7. (See the map in **Exhibit E-6** and table in **Exhibit E-7**.)

Plaintiffs' Illustrative Plan 2

54. I also developed *Plaintiffs' Illustrative Plan 2* depicted in **Figure 11** (on the next page). **Exhibit F-1** contains a similar map with street detail.

Figure 11**Plaintiffs' Illustrative Plan 2 – Ferguson-Florissant School District**

55. The table in **Figure 12** (on the next page) summarizes population statistics by district for *Plaintiffs' Illustrative Plan 2*. The four majority-Black districts range from 51.50% BVAP in District 6 to 75.67% BVAP in District 3. The plan has an overall deviation of 7.52% from the ideal population size. **Exhibit F-2** contains detailed population statistics for *Plaintiffs' Illustrative Plan 2*.

Figure 12**Plaintiffs' Illustrative Plan 2– 2010 Census Summary**

District	Population	% Dev	% Black	18+ Pop	% 18+ Black	% 18+ NH White
1	10020	2.15%	70.15%	7039	64.53%	32.09%
2	9494	-3.21%	66.46%	6688	60.89%	35.90%
3	9736	-0.74%	78.66%	6816	75.67%	19.76%
4	9755	-0.55%	31.10%	7671	28.12%	68.35%
5	10232	4.31%	20.20%	8008	17.42%	78.87%
6	9620	-1.93%	55.71%	7149	51.50%	45.14%
7	9806	-0.03%	44.90%	7400	40.86%	54.85%

56. *Plaintiffs' Illustrative Plan 2* generally follows 2014 precinct boundaries. (See **Exhibit F-3**.) Nine of the 96 precincts in the School District are split by *Plaintiffs' Illustrative Plan 2* district boundaries, with a few additional splits where the affected precincts are split by 2010 Census blocks. No census blocks are split by district boundaries under *Plaintiffs' Illustrative Plan 2*.

57. Public schools are balanced across all seven districts, with each district having two to four schools. (See the map in **Exhibit F-4** and table in **Exhibit F-5**.) *Plaintiffs' Illustrative Plan 2* pairs two incumbents who reside in the same census block in District 2. There are no other incumbent conflicts. (See the map in **Exhibit F-6** and table in **Exhibit F-7**.)

Compactness Scores

58. The districts in the Plaintiffs' illustrative plans are reasonably compact. Under *Illustrative Plan 1*, the overall mean average Reock compactness score for

the plan is .41, ranging from a low of .26 (District 4) to a high of .66 (District 6). (See **Exhibit E-8**.) Under *Illustrative Plan 2*, the overall mean average Reock compactness score for the plan is .38, ranging from a low of .29 (District 3) to a high of .46 (District 2).¹¹ (See **Exhibit F-8**.)

59. By comparison, Reock scores for the districts in the Plaintiffs' illustrative plans are in line with Reock scores for current municipal wards in St. Louis County. Of the 221 municipal wards in the County, the mean average Reock score is .39 – ranging from a low of .15 to a high of .66. Twenty-six wards (11.8%) score at or below the .26 recorded for District 4 under *Plaintiffs' Illustrative Plan 1* and 44 wards (19.9%) score at or below the .29 recorded for District 3 under *Plaintiffs' Illustrative Plan 2*.¹²

Contiguity

60. All districts in the Plaintiffs' illustrative plans are contiguous. With respect to redistricting plans, “contiguity” signifies that all parts (*i.e.*, census blocks) of each component election district are connected and there are no geographically disparate areas.

¹¹ “The Reock test is an area-based measure that compares each district to a circle, which is considered to be the most compact shape possible. For each district, the Reock test computes the ratio of the area of the district to the area of the minimum enclosing circle for the district. The measure is always between 0 and 1, with 1 being the most compact. The Reock test computes one number for each district and the minimum, maximum, mean and standard deviation for the plan.” (Source: *Maptitude For Redistricting* documentation.)

¹² I generated the compactness scores for the municipal wards using *Maptitude for Redistricting*.

III. SUMMARY CONCLUSIONS

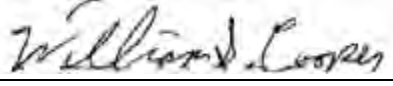
61. From the preceding analysis, I reach the following conclusions:

- The African-American population – in absolute numbers and percentages – has increased over the past two decades to the point where African Americans represent 47.33% of the voting age population (48.19% AP BVAP), based on the 2010 Census.
- As reported in the 3-Year *2011-2013 American Community Survey*, in the Ferguson-Florissant SD, non-Hispanic Whites significantly outpace African Americans across most key indicators of socio-economic well-being.
- African Americans in the Ferguson-Florissant SD are sufficiently numerous and geographically compact to comprise a majority of the voting-age population in four of seven single-member districts.
- In sum, both illustrative plans comply with traditional redistricting principles, including one-person one-vote, compactness, contiguity, respect for communities of interest, and the non-dilution of minority voting strength.

I reserve the right to continue to supplement my declarations in light of additional facts, testimony and/or materials that may come to light.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct according to the best of my knowledge, information and belief.

Executed on: May 27, 2015



WILLIAM S. COOPER

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Summary of Redistricting Work

I have a B.A. in Economics from Davidson College in Davidson, North Carolina.

Since 1986, I have prepared proposed redistricting maps of approximately 700 jurisdictions for Section 2 litigation, Section 5 comment letters, and for use in other efforts to promote compliance with the Voting Rights Act of 1965. I have analyzed and prepared election plans in over 100 of these jurisdictions for two or more of the decennial censuses – either as part of concurrent legislative reapportionments or, retrospectively, in relation to litigation involving many of the cases listed below.

Since the release of the 2010 Census in February 2011, I have developed statewide legislative plans on behalf of clients in six states (Alabama, Florida, Georgia, Kentucky, South Carolina, and Virginia), as well as over 150 local redistricting plans in approximately 30 states – primarily for groups working to protect minority voting rights.

In March 2011, I was retained by the Sussex County, Virginia Board of Supervisors and the Bolivar County, Mississippi Board of Supervisors to draft new district plans based on the 2010 Census. In the summer of 2011, both counties received Section 5 preclearance from the Department of Justice.

Also in 2011, I was retained by way of a subcontract with Olmedillo X5 LLC to assist with redistricting for the Miami-Dade County, Florida Board of Commissioners and the Miami-Dade, Florida School Board. Final plans were adopted in late 2011 following public hearings.

In the fall of 2011, I was retained by the City of Grenada, Mississippi to provide redistricting services. The ward plan I developed received preclearance in March 2012.

In 2012 and 2013, I served as a redistricting consultant for the Tunica County, Mississippi Board of Supervisors and the Claiborne County, Mississippi Board of Supervisors.

In March 2014, I was retained by the City of Decatur, Ala. as a redistricting consultant in *Voketz v. City of Decatur*.

I am currently a consultant and expert for the plaintiffs in *Georgia State Conference NAACP et al. v. Fayette County*; *Alabama Legislative Black Caucus et al. v. Alabama*; *Montes v. City of Yakima, Washington*; *Pope v. County of Albany, New York*; *Navajo Nation v. San Juan County, Utah*; *Fairley et al. v. Hattiesburg, Mississippi*; *Terrebonne Parish Branch NAACP et al. v. Jindal et al.*; *Davidson v. City of Cranston, Rhode Island*; *Missouri State Conference NAACP et al. v. Ferguson-Florissant School District et al.*; *Partee v. Coahoma County, Mississippi*; *Figgs v. Quitman County, Mississippi*; and *Calvin et al. v. Jefferson County, Florida*.

In *Montes v. City of Yakima* (E.D. Wash. Feb. 17, 2015) the court adopted, as a remedy for the Section 2 violation, a seven single-member district plan that I developed for the plaintiffs.

Since 2011, I have served as a redistricting and demographic consultant to the Massachusetts-based Prison Policy Initiative and to Demos for a nationwide project to end prison-based gerrymandering. I have analyzed proposed and adopted election plans in about 25 states as part of my work with these two organizations.

During the 2000s, I analyzed census data and prepared draft election plans involving about 300 local-level jurisdictions in 25 states. I produced these plans at the request of local

citizens' groups, national organizations such as the NAACP and, in a few instances, by contract with local governments. Election plans I developed for two counties – Sussex County, Virginia and Webster County, Mississippi – were adopted and precleared in 2002 by the U.S. Department of Justice. A ward plan I prepared for the City of Grenada, Mississippi was precleared in August 2005. A county council plan I developed for Native American plaintiffs in a Section 2 lawsuit (*Blackmoon v. Charles Mix County*) was adopted by Charles Mix County, South Dakota in November 2005. A county supervisors' plan I produced for Bolivar County, Mississippi was precleared in January 2006. A plan I drafted for Latino plaintiffs in Bethlehem, Pennsylvania (*Pennsylvania Statewide Latino Coalition v. Bethlehem Area School District*) was adopted in March 2009. Plans I developed for minority plaintiffs in Columbus County, North Carolina and Cortez-Montezuma School District in Colorado were adopted in 2009.

In addition, during the post-2000 reapportionment process, I drafted proposed statewide legislative plans on behalf of clients in eight states – Florida, Montana, New Mexico, North Dakota, South Dakota, Tennessee, Virginia, and Wyoming. In August 2005, a federal court ordered the State of South Dakota to remedy a Section 2 voting rights violation and adopt a state legislative plan I developed (*Bone Shirt v. Hazeltine*).

Since 1986, I have prepared election plans for Section 2 litigation in Alabama, Connecticut, Florida, Georgia, Louisiana, Maryland, Mississippi, Missouri, Montana, Nebraska, New Jersey, New York, North Carolina, Ohio, Pennsylvania, South Carolina, South Dakota, Tennessee, Utah, Virginia, Washington, and Wyoming.

I have testified at trial as an expert witness on redistricting and demographics in federal courts in the following voting rights cases (approximate most recent testimony dates are in parentheses):

Alabama

Alabama Legislative Black Caucus et al. v. Alabama et al. (2013)

Colorado

Cuthair v. Montezuma-Cortez School Board (1997)

Georgia

Cofield v. City of LaGrange (1996)

Love v. Deal (1995)

Askew v. City of Rome (1995)

Woodard v. Lumber City (1989)

Louisiana

Knight v. McKeithen (1994)

Reno v. Bossier Parish (1995)

Wilson v. Town of St. Francisville (1997)

Maryland

Cane v. Worcester County (1994)

Mississippi

Addy v Newton County (1995)

Boddie v. Cleveland (2003)

Boddie v. Cleveland School District (2010)

Ewing v. Monroe County (1995)

Fairley v. Hattiesburg (2014)

Fairley v. Hattiesburg (2008)

Jamison v. City of Tupelo (2006)

Gunn v. Chickasaw County (1995)

NAACP v. Fordice (1999)

Nichols v. Okolona (1995)

Smith v. Clark (1995)

Montana

Old Person v. Cooney (1998)

Old Person v. Brown (on remand) (2001)

Nebraska

Stabler v. Thurston County (1995)

New York

Arbor Hills Concerned Citizens v. Albany County (2003)

Pope v. County of Albany (2015)

South Carolina

Smith v. Beasley (1996)

South Dakota

Bone Shirt v. Hazeltine (2004)
Cottier v. City of Martin (2004)

Tennessee

Cousins v. McWherter (1994)
Rural West Tennessee African American Affairs Council v. McWherter (1993)

Virginia

Henderson v. Richmond County (1988)
McDaniel v. Mehfoud (1988)
White v. Daniel (1989)
Smith v. Brunswick County (1991)

Wyoming

Large v. Fremont County (2007)

In addition, I have filed declarations or been deposed in these voting rights cases:

Alabama

Voketz v. City of Decatur (2014)

Florida

Burton v. City of Belle Glade (1997)
Johnson v. DeSoto County (1999)
Thompson v. Glades County (2001)

Georgia

Georgia State Conference NAACP, et al. v. Fayette County (2012)
Jones v. Cook County (1993)
Johnson v. Miller (1998)
Knighton v. Dougherty County (2002)

Kentucky

Herbert v. Kentucky State Board of Elections (2013)

Louisiana

Terrebonne Parish NAACP v. Jindal, et al. (2015)
NAACP v. St. Landry Parish Council (2005)
Prejean v. Foster (1994)
Rodney v. McKeithen (1993)

Maryland

Fletcher v. Lamone (2011)

Mississippi

Partee v. Coahoma County (2015)
Figgs v. Quitman County (2015)
Williams v. Bolivar County (2005)
Clark v. Calhoun County (on remand)(1993)
Houston v. Lafayette County (2002)
Wilson v. Clarksdale (1992)
Stanfield v. Lee County(1991)
Teague v. Attala County (on remand)(1993)

Montana

Alden v. Rosebud County (2000)

North Carolina

Lewis v. Alamance County (1991)
Gause v. Brunswick County (1992)
Webster v. Person County (1992)

South Carolina

Vander Linden v. Campbell (1996)

South Dakota

Emery v. Hunt (1999)
Kirkie v. Buffalo County (2004)

Tennessee

NAACP v. Frost, et al. (2003)

Utah

Navajo Nation v. San Juan County (2014)

Virginia

Moon v. Beyer (1990)

Washington

Montes v. City of Yakima (2014)

###

Ferguson-Florissant SD – 1990 Census to 2010 Census Population and Race Distribution

	1990 Number	Percent	2000 Number	Percent	2010 Number	Percent
Total Population	80,938	100%	73,767	100%	69,050	100%
Total Hispanics	656	0.81%	922	1.34%	1,342	1.94%
White*	59,995	74.12%	43,811	63.45%	29,698	43.01%
Black*	19,694	24.33%	27,170	39.35%	35,968	52.09%
American Indian and Native American*	126	0.16%	151	0.22%	168	0.24%
Asian*#	402	0.50%	492	0.71%	395	0.57%
Hawaiian and Pacific Islander*#	NA	NA	15	0.02%	14	0.02%
Other*	65	0.08%	114	0.17%	126	0.18%
Two or More Races*	NA	NA			1,339	1.94%
Black (Including Hispanics)	19,783	28.65%	27,270	39.49%	36,101	52.28%
Any Part Black (Including Hispanics)	NA	NA	NC	NC	37,212	53.89%

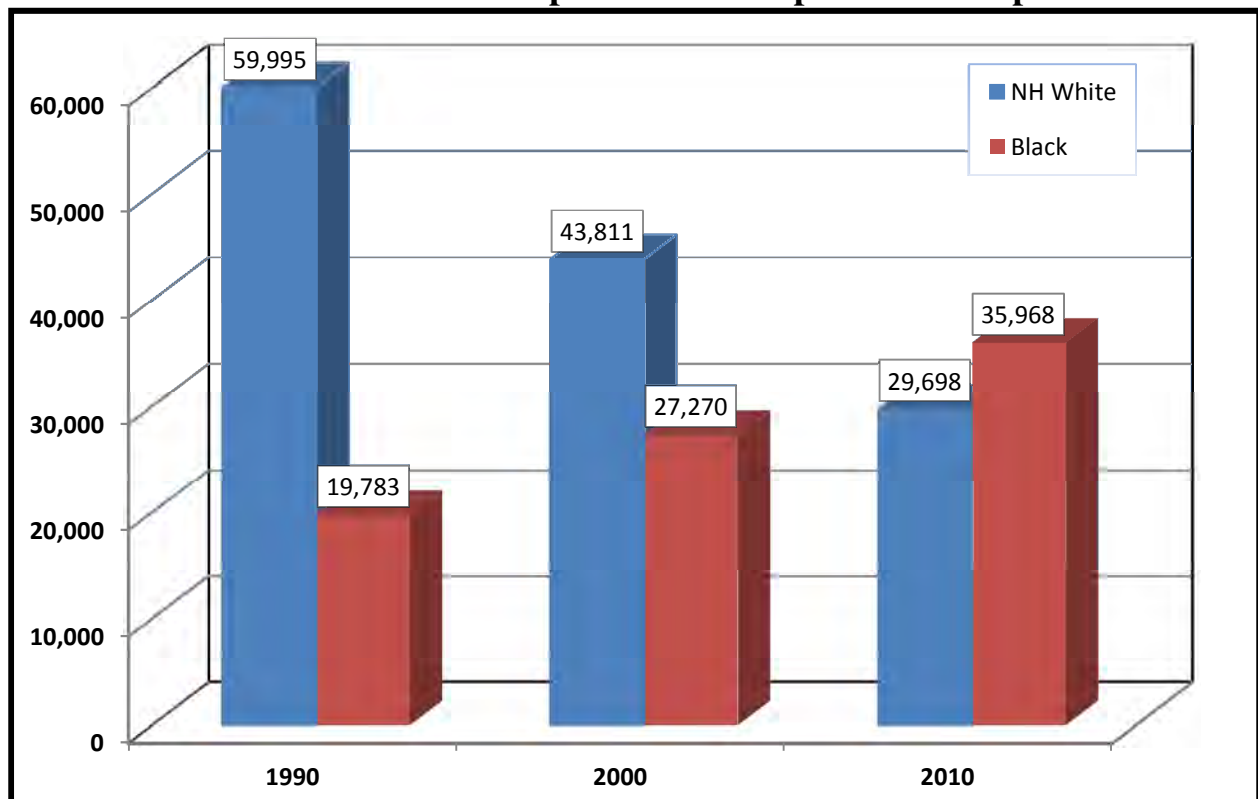
* Non-Hispanics only

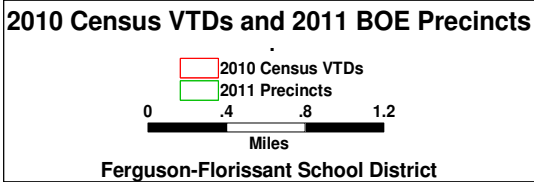
In 1990, “Asian” includes Hawaiian and Pacific Islander.

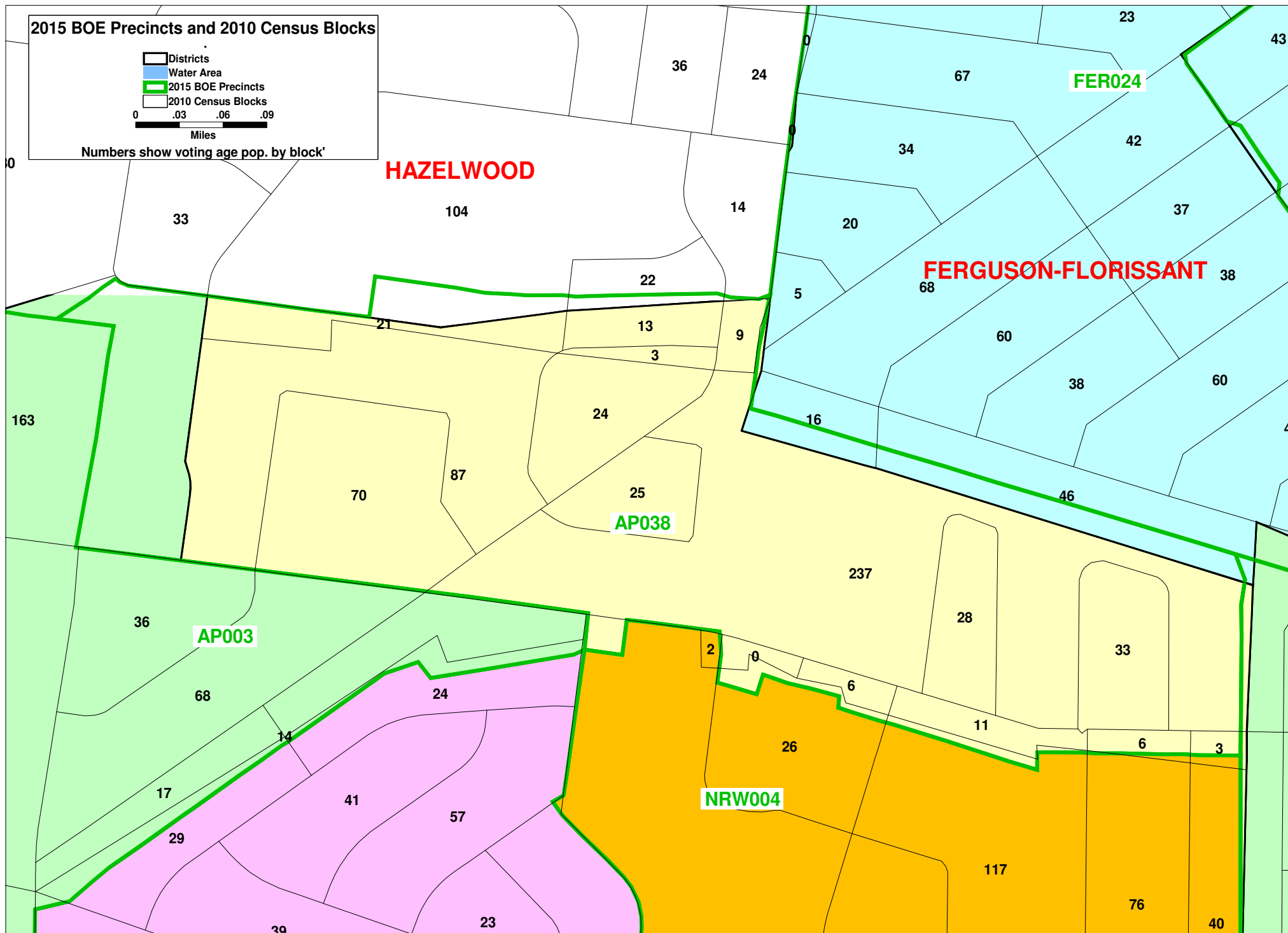
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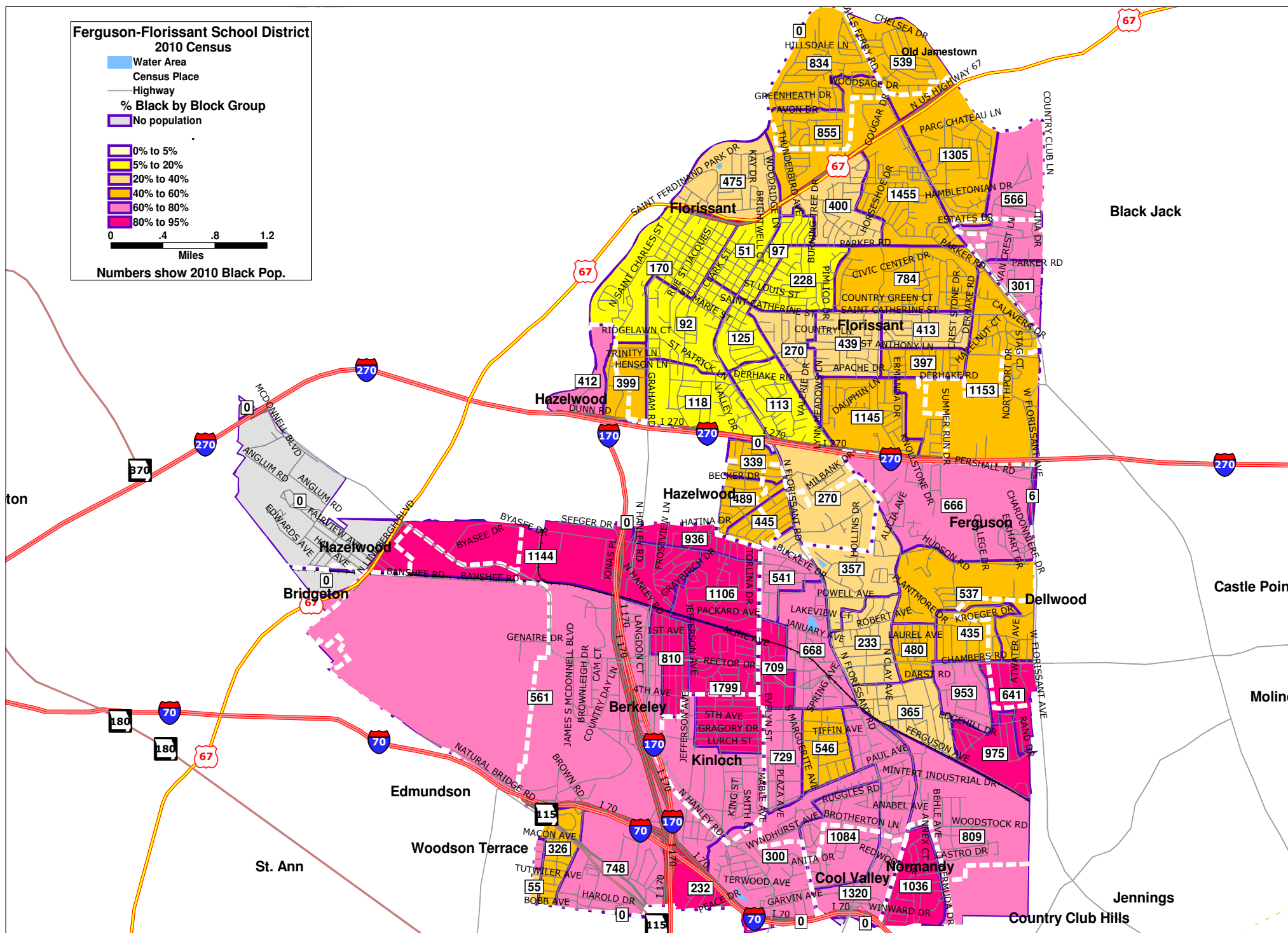
NC Not Calculated

Ferguson-Florissant SD – 1990 Census to 2010 Census African-American and Non-Hispanic White Population Comparison









Selected Socio-Economic Data

Ferguson-Florissant School District, Missouri

African American and White, Not Hispanic

Data Set: 2011-2013 American Community Survey 3-Year Estimates

[20-Nov-14](#)

C02003. RACE - Universe: TOTAL POPULATION

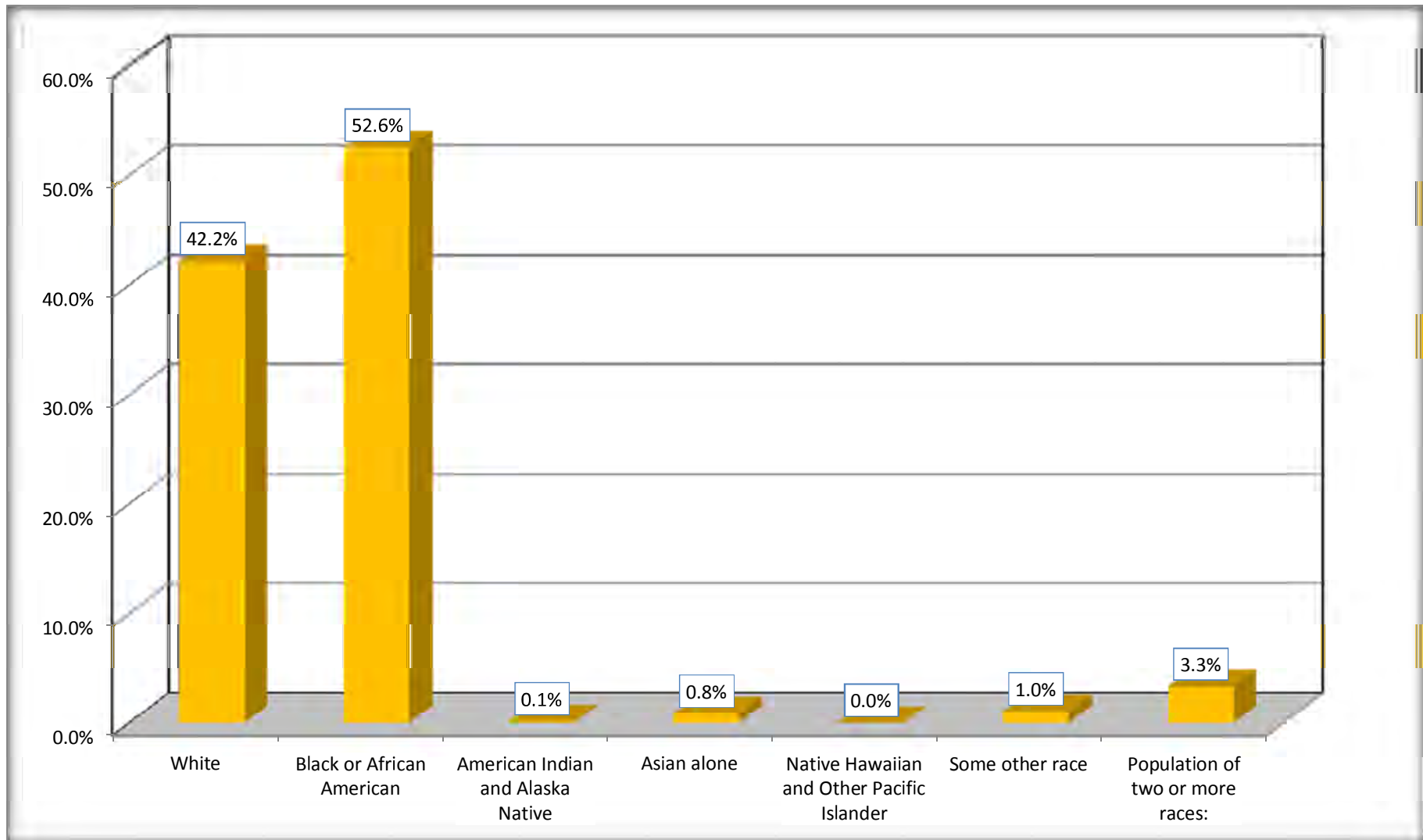
Data Set: 2011-2013 American Community Survey 3-Year Estimates

	Ferguson-Florissant School District, Missouri		
	Population	Margin of Error (+/-)	% of Total
Total:	66,758	2776	100.0%
Population of one race:	64,562	2,878	96.7%
White	28,160	1,789	42.2%
Black or African American	35,087	2,458	52.6%
American Indian and Alaska Native	85	122	0.1%
Asian alone	544	273	0.8%
Native Hawaiian and Other Pacific Islander	0	104	0.0%
Some other race	686	470	1.0%
Population of two or more races:	2,196	743	3.3%
Two races including Some other race	38	45	0.1%
Two races excluding Some other race, and three or more races	2,158	741	3.2%
Population of two races:	2,043	730	3.1%
White; Black or African American	1,183	516	1.8%
White; American Indian and Alaska Native	117	73	0.2%
White; Asian	182	176	0.3%
Black or African American; American Indian and Alaska Native	381	401	0.6%
All other two race combinations	180	150	0.3%
Population of three races	153	112	0.2%
Population of four or more races	0	104	0.0%

Note: Hispanics may be of any race. See Table C03002 and chart.

Source: U.S. Census Bureau, 2011-2013 American Community Survey

Although the American Community Survey (ACS) produces population, demographic and housing unit estimates, it is the Census Bureau's Population Estimates Program that produces and disseminates the official estimates of the population for the nation, states, counties, cities and towns and estimates of housing units for states and counties.

Population by Race**Ferguson-Florissant School District, Missouri**

Source: C02003. RACE - Universe: TOTAL POPULATION
Data Set: 2011-2013 American Community Survey 3-Year Estimates

C03002. HISPANIC OR LATINO ORIGIN BY RACE - Universe: TOTAL POPULATION

Data Set: 2011-2013 American Community Survey 3-Year Estimates

	Ferguson-Florissant School District, Missouri		
	Population	Margin of Error (+/-)	% of Total
Total:	66,758	2776	100.0%
Not Hispanic or Latino:	65,795	2697	98.6%
White alone	27,587	1,717	41.3%
Black or African American alone	34,955	2,444	52.4%
American Indian and Alaska Native alone	85	122	0.1%
Asian alone	544	273	0.8%
Native Hawaiian and Other Pacific Islander alone	0	104	0.0%
Some other race alone	489	482	0.7%
Two or more races:	2,135	740	3.2%
Two races including Some other race	25	40	0.0%
Two races excluding Some other race, and three or more races	2,110	740	3.2%
Hispanic or Latino	963	477	1.4%

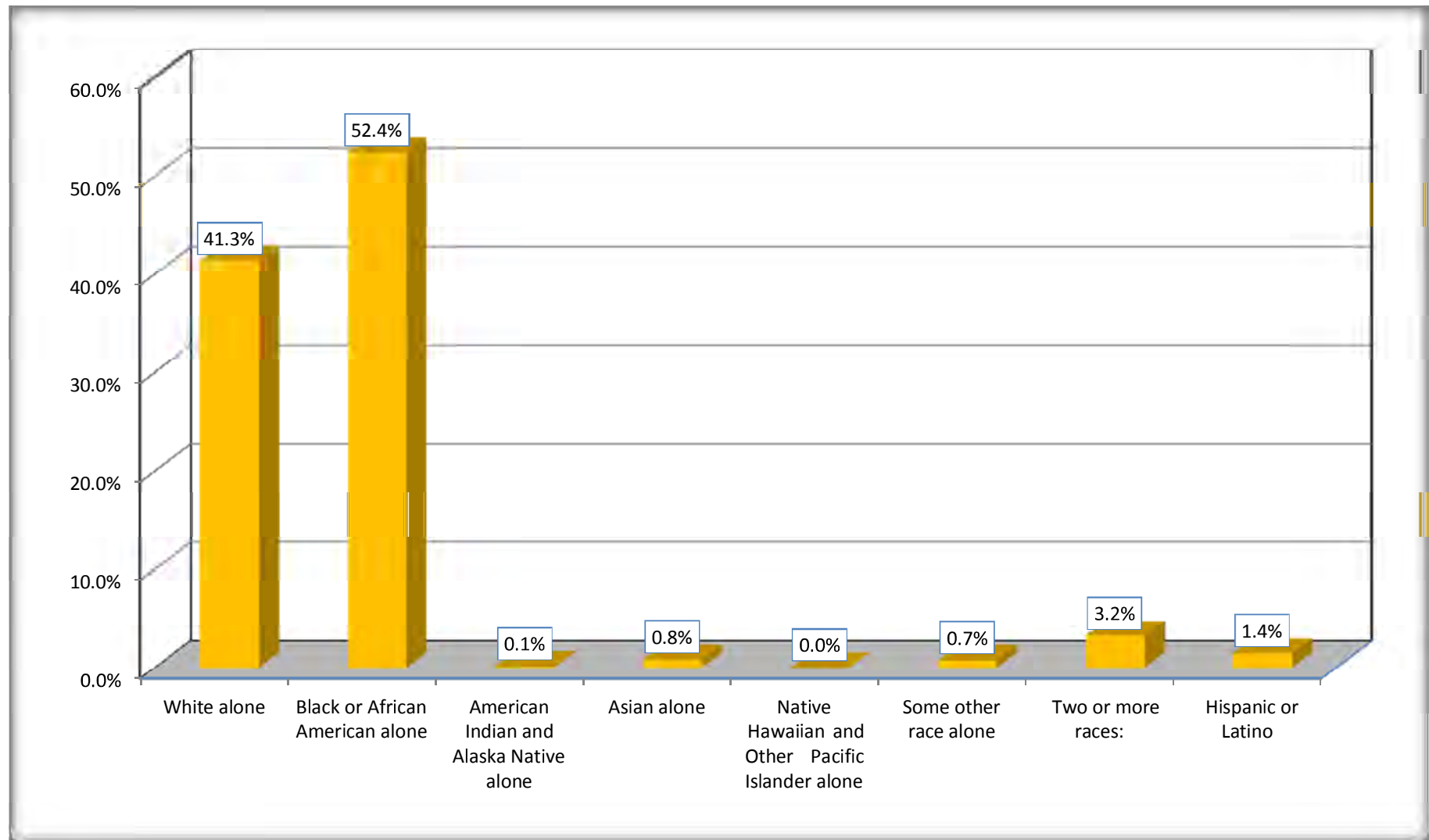
Source: U.S. Census Bureau, 2011-2013 American Community Survey

Although the American Community Survey (ACS) produces population, demographic and housing unit estimates, it is the Census Bureau's Population Estimates Program that produces and disseminates the official estimates of the population for the nation, states, counties, cities and towns and estimates of housing units for states and counties.

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

Non-Hispanic by Race and Hispanic Population
Ferguson-Florissant School District, Missouri



Source: C03002. HISPANIC OR LATINO ORIGIN BY RACE - Universe: TOTAL POPULATION
Data Set: 2011-2013 American Community Survey 3-Year Estimates

C01001. SEX BY AGE

Data Set: 2011-2013 American Community Survey 3-Year Estimates

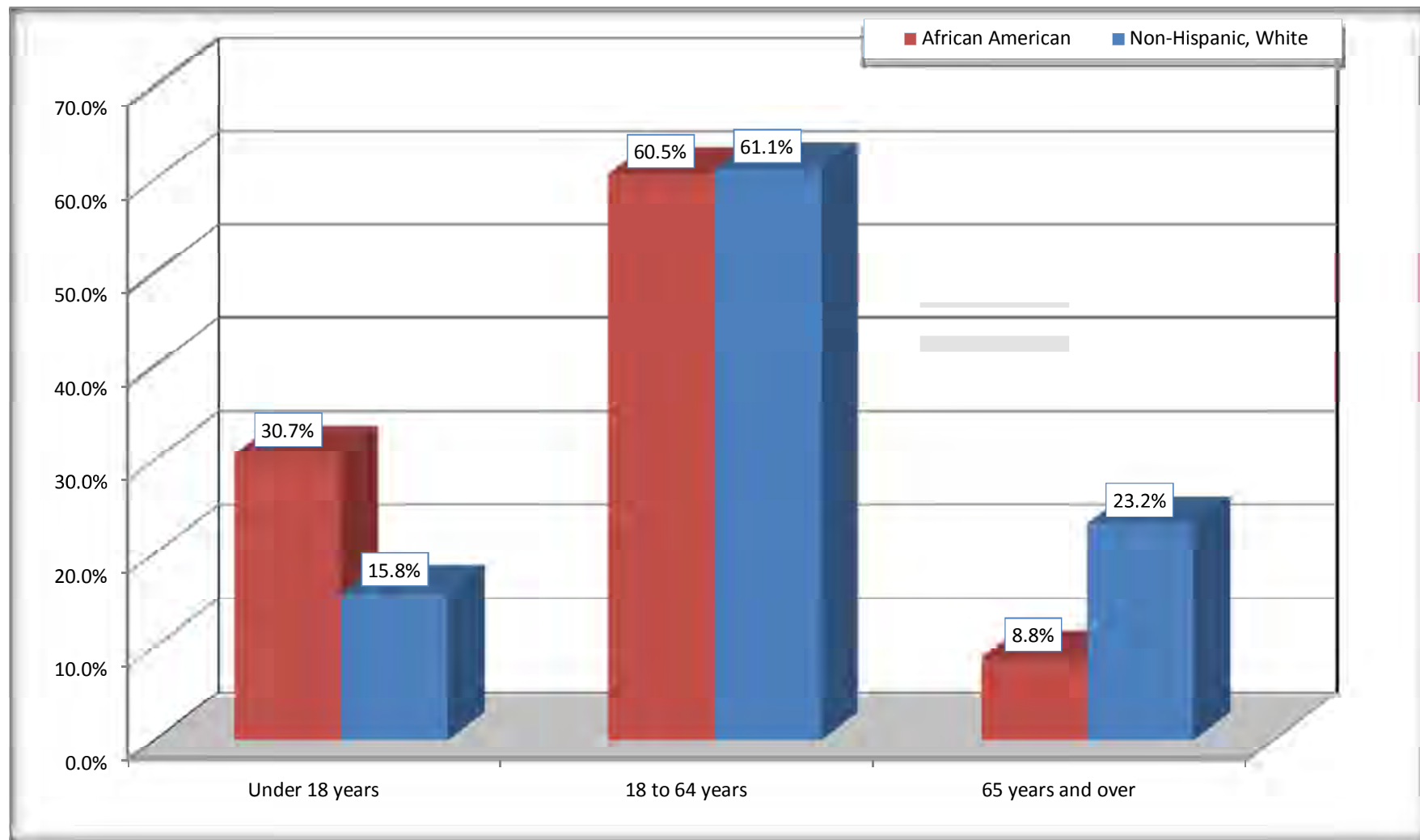
	Ferguson-Florissant School District, Missouri					
	African-American	Margin of Error (+/-)	% of AA Total	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total
Total:	35,087	2,458	100.0%	27,587	1,717	100.0%
Under 18 years	10,774	NC	30.7%	4,345	NC	15.8%
18 to 64 years	21,237	NC	60.5%	16,847	NC	61.1%
65 years and over	3,076	NC	8.8%	6,395	NC	23.2%
Male:	14,881	1,433	42.4%	13,401	1,012	48.6%
Under 18 years	5,299	975	15.1%	2,368	501	8.6%
18 to 64 years	8,358	954	23.8%	8,499	826	30.8%
65 years and over	1,224	291	3.5%	2,534	363	9.2%
Female:	20,206	1,571	57.6%	14,186	987	51.4%
Under 18 years	5,475	905	15.6%	1,977	410	7.2%
18 to 64 years	12,879	978	36.7%	8,348	669	30.3%
65 years and over	1,852	367	5.3%	3,861	534	14.0%

Source: U.S. Census Bureau, 2011-2013 American Community Survey

Although the American Community Survey (ACS) produces population, demographic and housing unit estimates, it is the Census Bureau's Population Estimates Program that produces and disseminates the official estimates of the population for the nation, states, counties, cities and towns and estimates of housing units for states and counties.

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

Population by Age**Ferguson-Florissant School District, Missouri**

Source: C01001. SEX BY AGE

Data Set: 2011-2013 American Community Survey 3-Year Estimates

**B07004. GEOGRAPHICAL MOBILITY IN THE PAST YEAR BY RACE FOR CURRENT RESIDENCE IN THE UNITED STATES - Universe:
POPULATION 1 YEAR AND OVER**

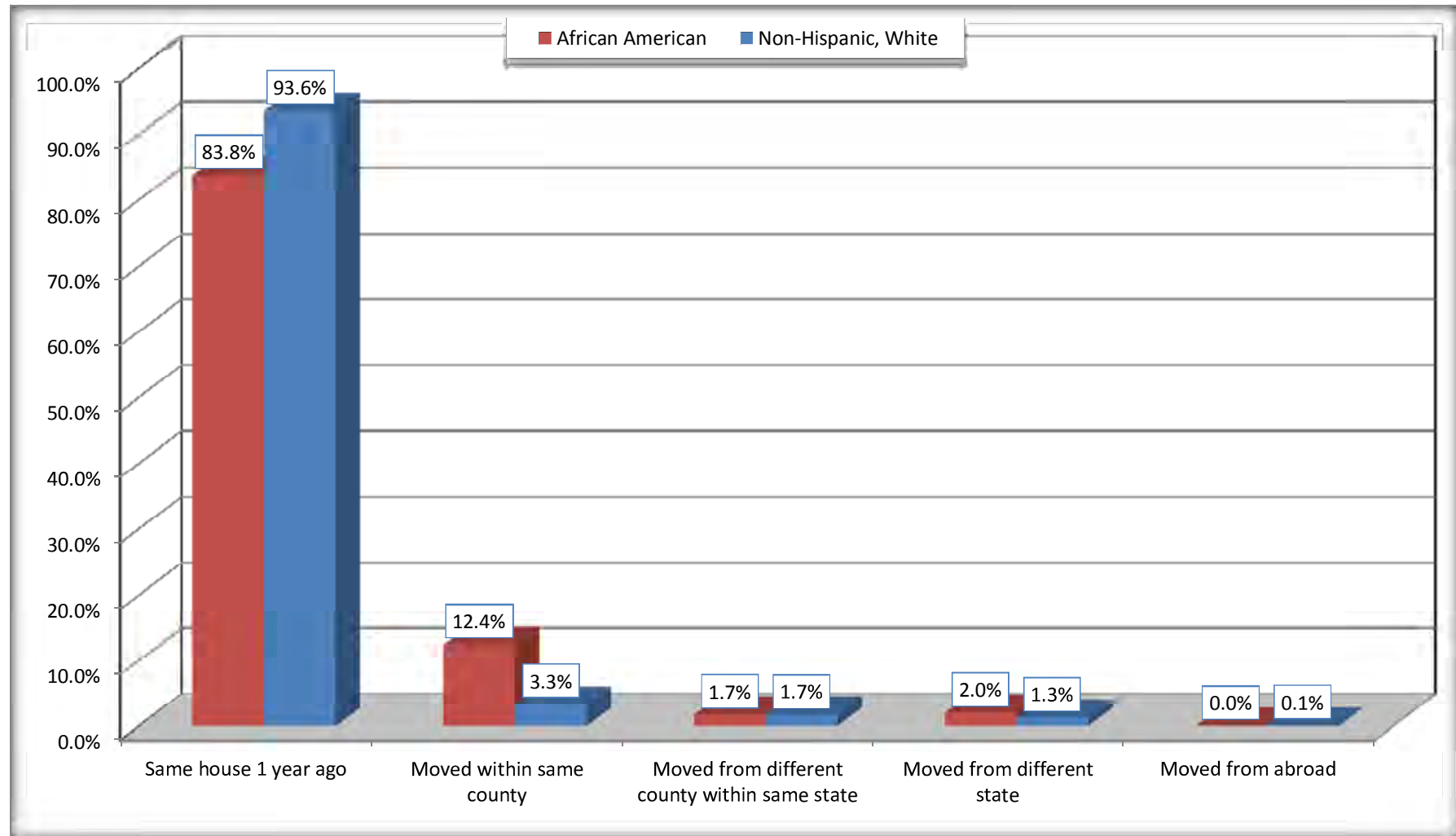
Data Set: 2011-2013 American Community Survey 3-Year Estimates

	Ferguson-Florissant School District, Missouri					
	African-American	Margin of Error (+/-)	% of AA Total	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total
Total:	34,563	2,409	100.0%	27,297	1,696	100.0%
Same house 1 year ago	28,974	2,025	83.8%	25,556	1,754	93.6%
Moved within same county	4,292	1,226	12.4%	905	385	3.3%
Moved from different county within same state	596	504	1.7%	466	203	1.7%
Moved from different state	696	443	2.0%	347	233	1.3%
Moved from abroad	5	8	0.0%	23	31	0.1%

Source: U.S. Census Bureau, 2011-2013 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

Geographical Mobility in the Past Year (Population 1 Year and Over)**Ferguson-Florissant School District, Missouri**

Source: B07004. GEOGRAPHICAL MOBILITY IN THE PAST YEAR BY RACE FOR CURRENT RESIDENCE IN THE UNITED STATES - Universe: POPULATION 1 YEAR AND OVER

Data Set: 2011-2013 American Community Survey 3-Year Estimates

C08105. MEANS OF TRANSPORTATION TO WORK - Universe: WORKERS 16 YEARS AND OVER

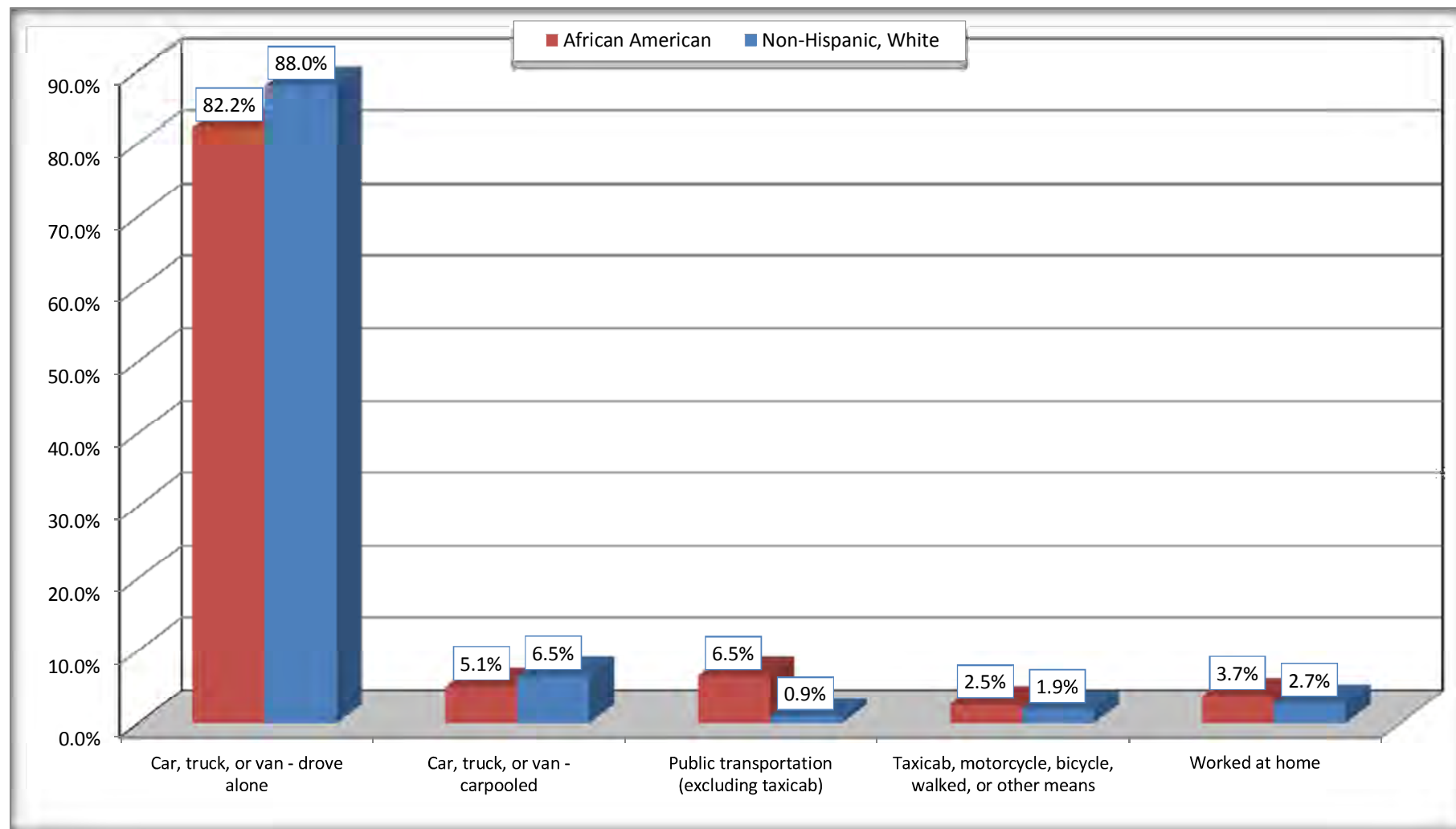
Data Set: 2011-2013 American Community Survey 3-Year Estimates

	Ferguson-Florissant School District, Missouri					
	African-American	Margin of Error (+/-)	% of AA Total	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total
Total:	14408	1096	100.0%	12785	976	100.0%
Car, truck, or van - drove alone	11845	1125	82.2%	11248	917	88.0%
Car, truck, or van - carpooled	728	235	5.1%	832	255	6.5%
Public transportation (excluding taxicab)	931	311	6.5%	112	78	0.9%
Taxicab, motorcycle, bicycle, walked, or other means	367	214	2.5%	242	129	1.9%
Worked at home	537	206	3.7%	351	192	2.7%

Source: U.S. Census Bureau, 2011-2013 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

Means of Transportation to Work (Workers 16 Years and Over)**Ferguson-Florissant School District, Missouri**

Source: C08105. MEANS OF TRANSPORTATION TO WORK - Universe: WORKERS 16 YEARS AND OVER
 Data Set: 2011-2013 American Community Survey 3-Year Estimates

C15002. SEX BY EDUCATIONAL ATTAINMENT FOR THE POPULATION 25 YEARS AND OVER

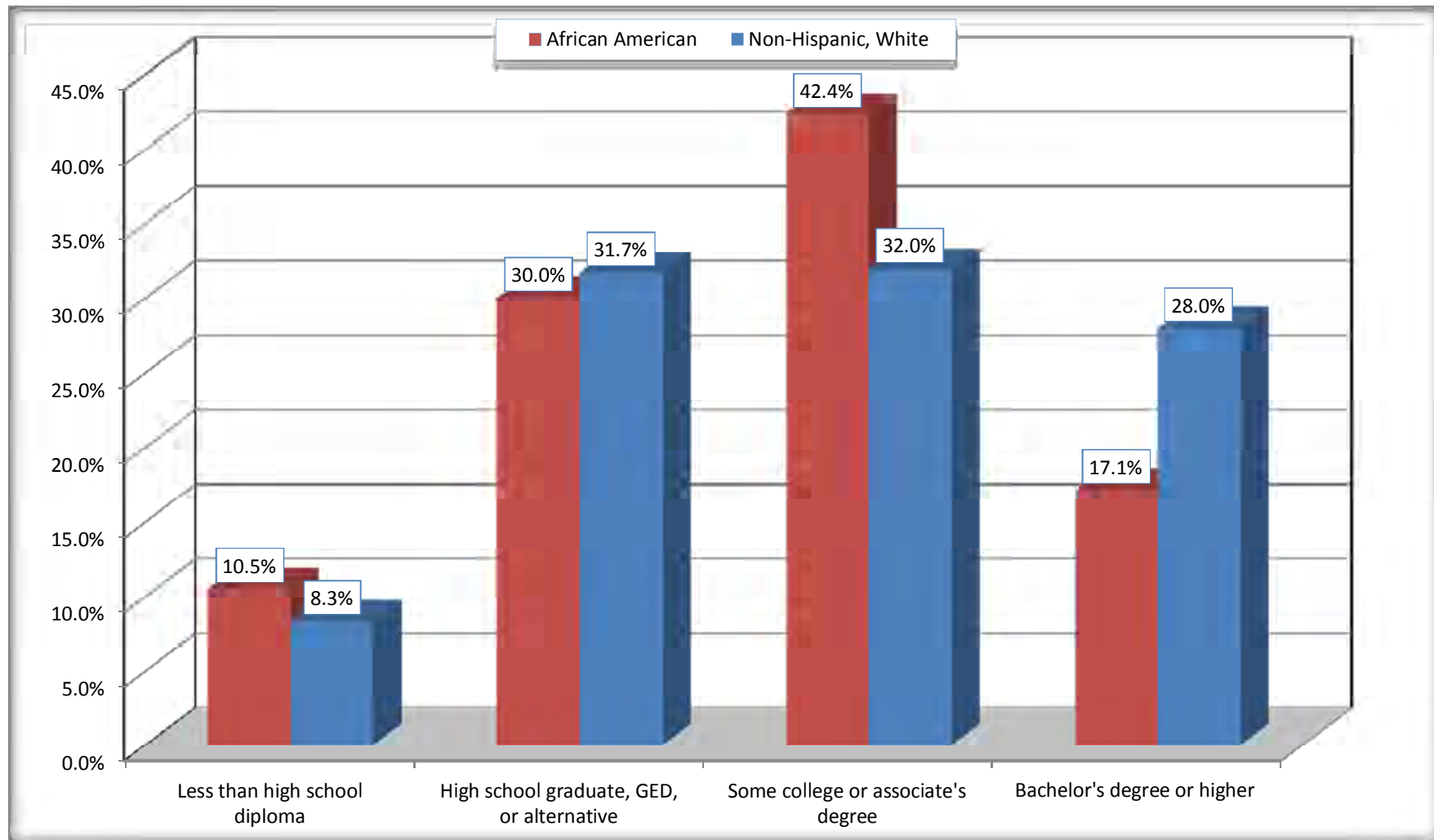
Data Set: 2011-2013 American Community Survey 3-Year Estimates

	Ferguson-Florissant School District, Missouri					
	African-American	Margin of Error (+/-)	% of AA Total	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total
Total:	20,459	1,404	100.0%	21,419	1,332	100.0%
Less than high school diploma	2,148	NC	10.5%	1,785	NC	8.3%
High school graduate, GED, or alternative	6,142	NC	30.0%	6,795	NC	31.7%
Some college or associate's degree	8,665	NC	42.4%	6,847	NC	32.0%
Bachelor's degree or higher	3,504	NC	17.1%	5,992	NC	28.0%
Male:	7,639	752	37.3%	10,028	771	46.8%
Less than high school diploma	858	267	4.2%	668	199	3.1%
High school graduate, GED, or alternative	2,573	425	12.6%	3,275	494	15.3%
Some college or associate's degree	3,019	506	14.8%	3,205	510	15.0%
Bachelor's degree or higher	1,189	315	5.8%	2,880	418	13.4%
Female:	12,820	966	62.7%	11,391	760	53.2%
Less than high school diploma	1,290	274	6.3%	1,117	296	5.2%
High school graduate, GED, or alternative	3,569	524	17.4%	3,520	466	16.4%
Some college or associate's degree	5,646	847	27.6%	3,642	501	17.0%
Bachelor's degree or higher	2,315	432	11.3%	3,112	423	14.5%

Source: U.S. Census Bureau, 2011-2013 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

Educational Attainment for the Population 25 Years and Older**Ferguson-Florissant School District, Missouri**

Source: C15002. SEX BY EDUCATIONAL ATTAINMENT FOR THE POPULATION 25 YEARS AND OVER
Data Set: 2011-2013 American Community Survey 3-Year Estimates

B16005. NATIVITY BY LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER
 Data Set: 2011-2013 American Community Survey 3-Year Estimates

Exhibit D

	Ferguson-Florissant School District, Missouri					
	African-American	Margin of Error (+/-)	% of AA Total	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total
Total:	32,672	2,203	100.0%	26,150	1,586	100.0%
Speak only English	31,946	NC	97.8%	25,429	NC	97.2%
Speak another language	726	NC	2.2%	721	NC	2.8%
Speak English "very well"	628	NC	1.9%	605	NC	2.3%
Speak English "less than very well"	98	NC	0.3%	116	NC	0.4%
Native:	32,310	2,233	98.9%	25,890	1,557	99.0%
Speak only English	31,878	2,216	97.6%	25,282	1,480	96.7%
Speak another language	432	234	1.3%	608	269	2.3%
Speak English "very well"	349	188	1.1%	529	245	2.0%
Speak English "less than very well"	83	95	0.3%	79	91	0.3%
Foreign born:	362	204	1.1%	260	129	1.0%
Speak only English	68	57	0.2%	147	81	0.6%
Speak another language	294	191	0.9%	113	110	0.4%
Speak English "very well"	279	186	0.9%	76	64	0.3%
Speak English "less than very well"	15	26	0.0%	37	59	0.1%

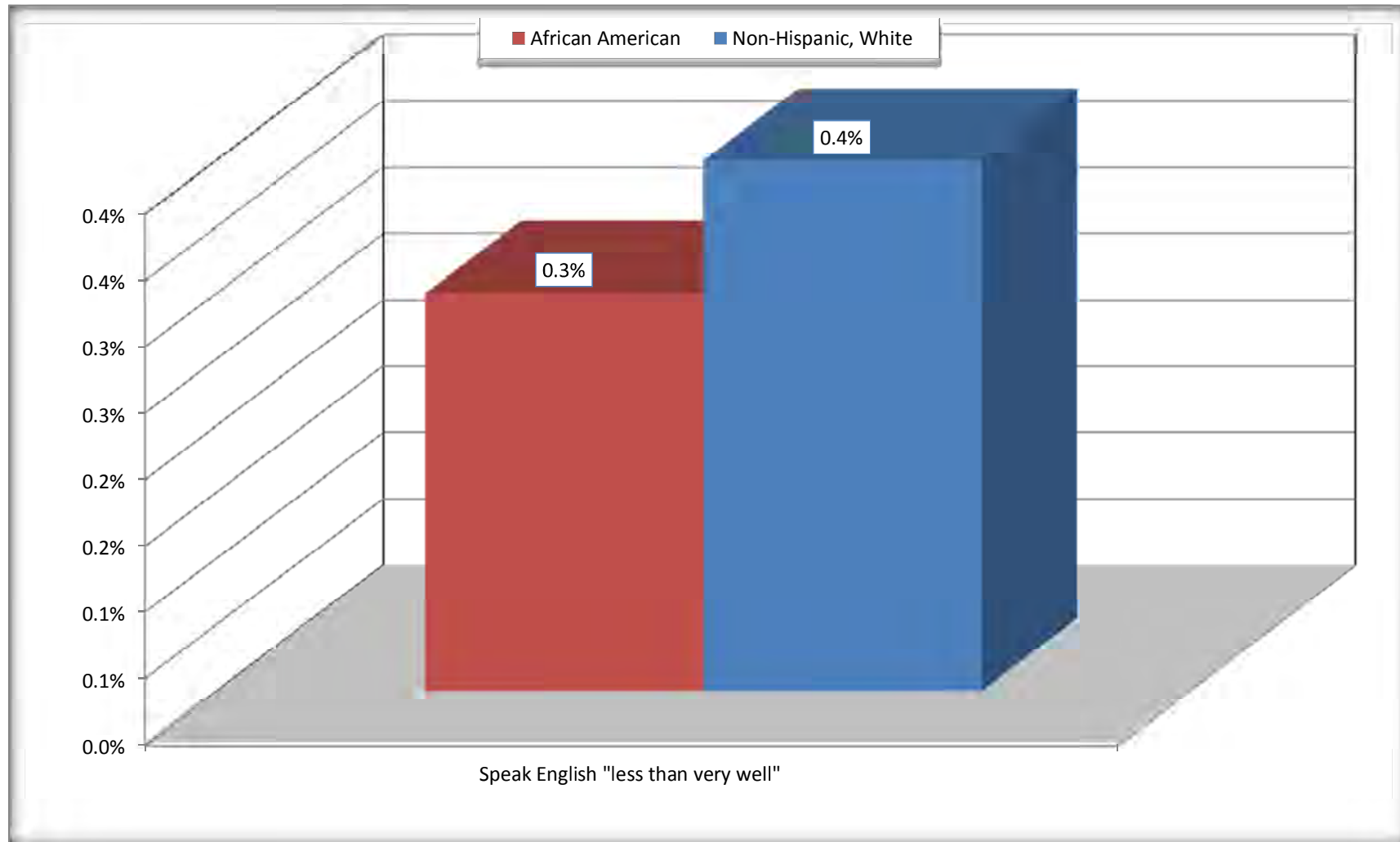
Source: U.S. Census Bureau, 2011-2013 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

Speak English "Less than Very Well" (Population 5 Years and Over)

Ferguson-Florissant School District, Missouri



Source: B16005. NATIVITY BY LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER
Data Set: 2011-2013 American Community Survey 3-Year Estimates

C17010. POVERTY STATUS IN THE PAST 12 MONTHS OF FAMILIES BY FAMILY TYPE BY PRESENCE OF RELATED CHILDREN UNDER 18 YEARS

Data Set: 2011-2013 American Community Survey 3-Year Estimates

	Ferguson-Florissant School District, Missouri					
	African-American	Margin of Error (+/-)	% of AA Total	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total
Total:	9,456	749	100.0%	7,829	550	100.0%
Income in the past 12 months below poverty level:	1,982	379	21.0%	398	185	5.1%
Married-couple family:	134	98	1.4%	245	161	3.1%
With related children under 18 years	113	94	1.2%	232	159	3.0%
Other family:	1,848	384	19.5%	153	125	2.0%
Male householder, no wife present	123	157	1.3%	63	61	0.8%
With related children under 18 years	21	27	0.2%	63	61	0.8%
Female householder, no husband present	1,725	353	18.2%	90	113	1.1%
With related children under 18 years	1,447	373	15.3%	71	94	0.9%
Income in the past 12 months at or above poverty level:	7,474	704	79.0%	7,431	571	94.9%
Married-couple family:	3,392	556	35.9%	5,313	507	67.9%
With related children under 18 years	1,561	402	16.5%	1,500	316	19.2%
Other family:	4,082	538	43.2%	2,118	432	27.1%
Male householder, no wife present	794	289	8.4%	599	203	7.7%
With related children under 18 years	431	266	4.6%	197	120	2.5%
Female householder, no husband present	3,288	461	34.8%	1,519	363	19.4%
With related children under 18 years	2,225	419	23.5%	658	245	8.4%

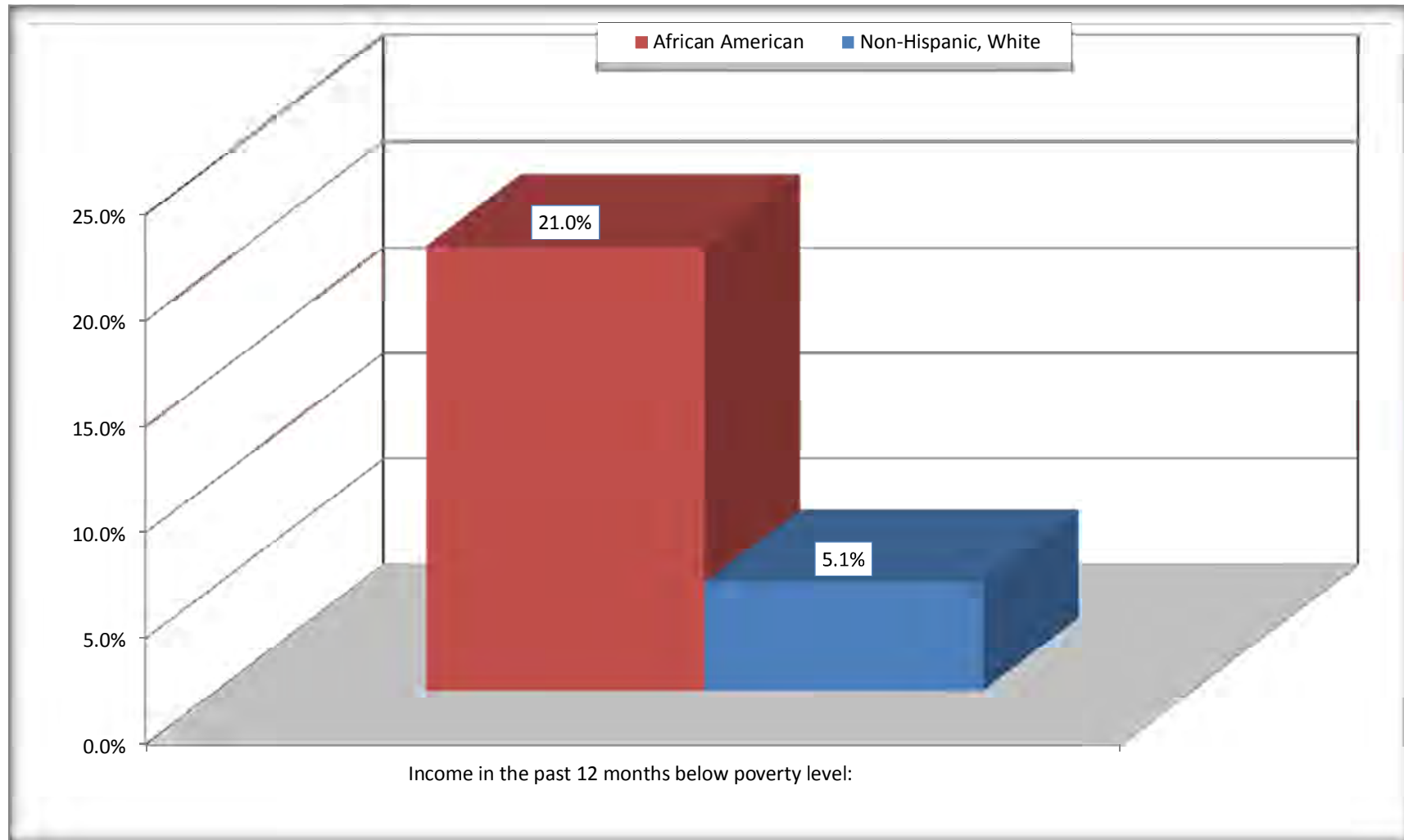
Source: U.S. Census Bureau, 2011-2013 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

Family Households Below Poverty in the Past 12 Months

Ferguson-Florissant School District, Missouri

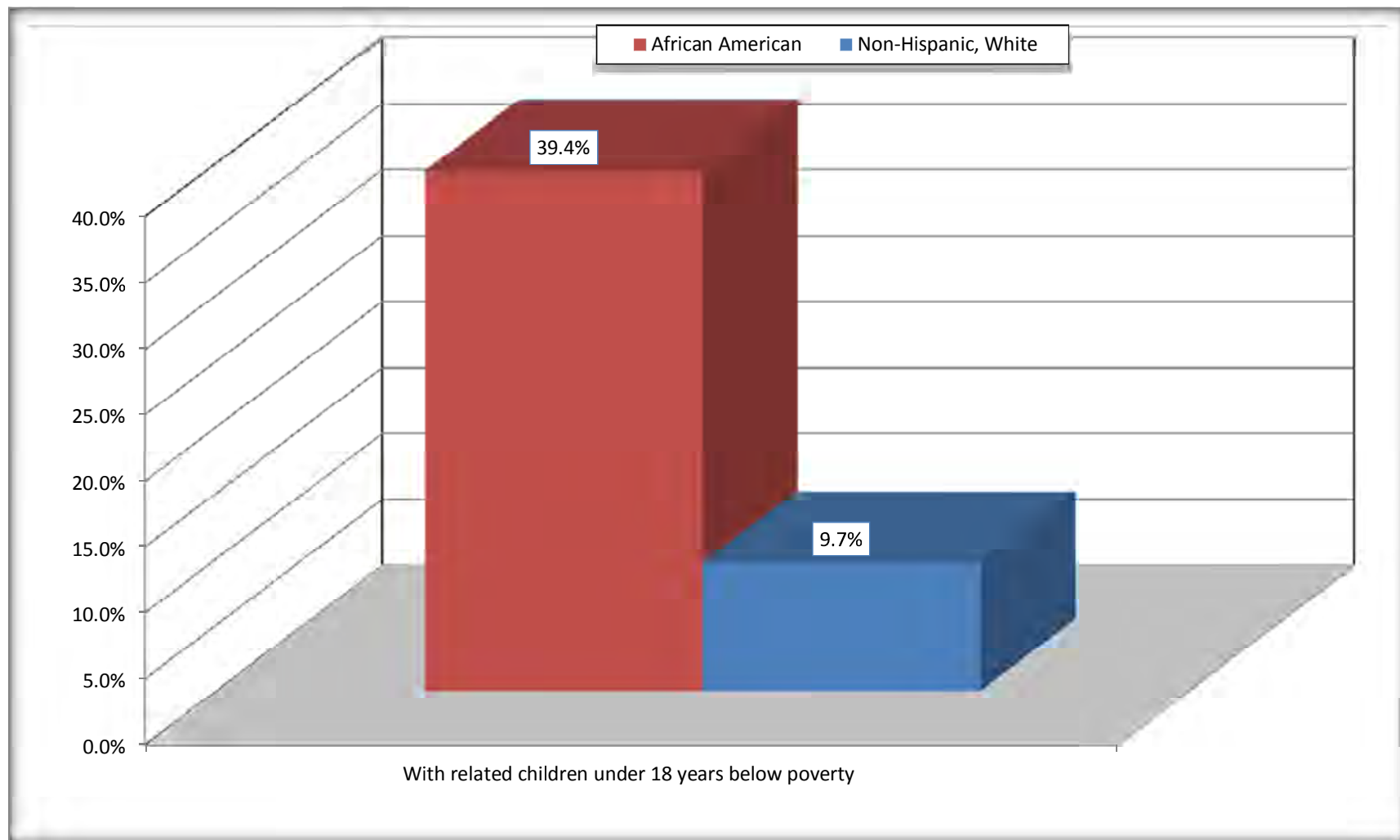


Source: C17010. POVERTY STATUS IN THE PAST 12 MONTHS OF FAMILIES BY FAMILY TYPE BY PRESENCE OF RELATED CHILDREN UNDER 18 YEARS

Data Set: 2011-2013 American Community Survey 3-Year Estimates

Female-headed Households with Related Children Below Poverty in the Past 12 Months

Ferguson-Florissant School District, Missouri



Source: C17010. POVERTY STATUS IN THE PAST 12 MONTHS OF FAMILIES BY FAMILY TYPE BY PRESENCE OF RELATED CHILDREN UNDER 18 YEARS

Data Set: 2011-2013 American Community Survey 3-Year Estimates

B17020 POVERTY STATUS IN THE PAST 12 MONTHS BY AGE - Universe: POPULATION FOR WHOM POVERTY STATUS IS DETERMINED

Data Set: 2011-2013 American Community Survey 3-Year Estimates

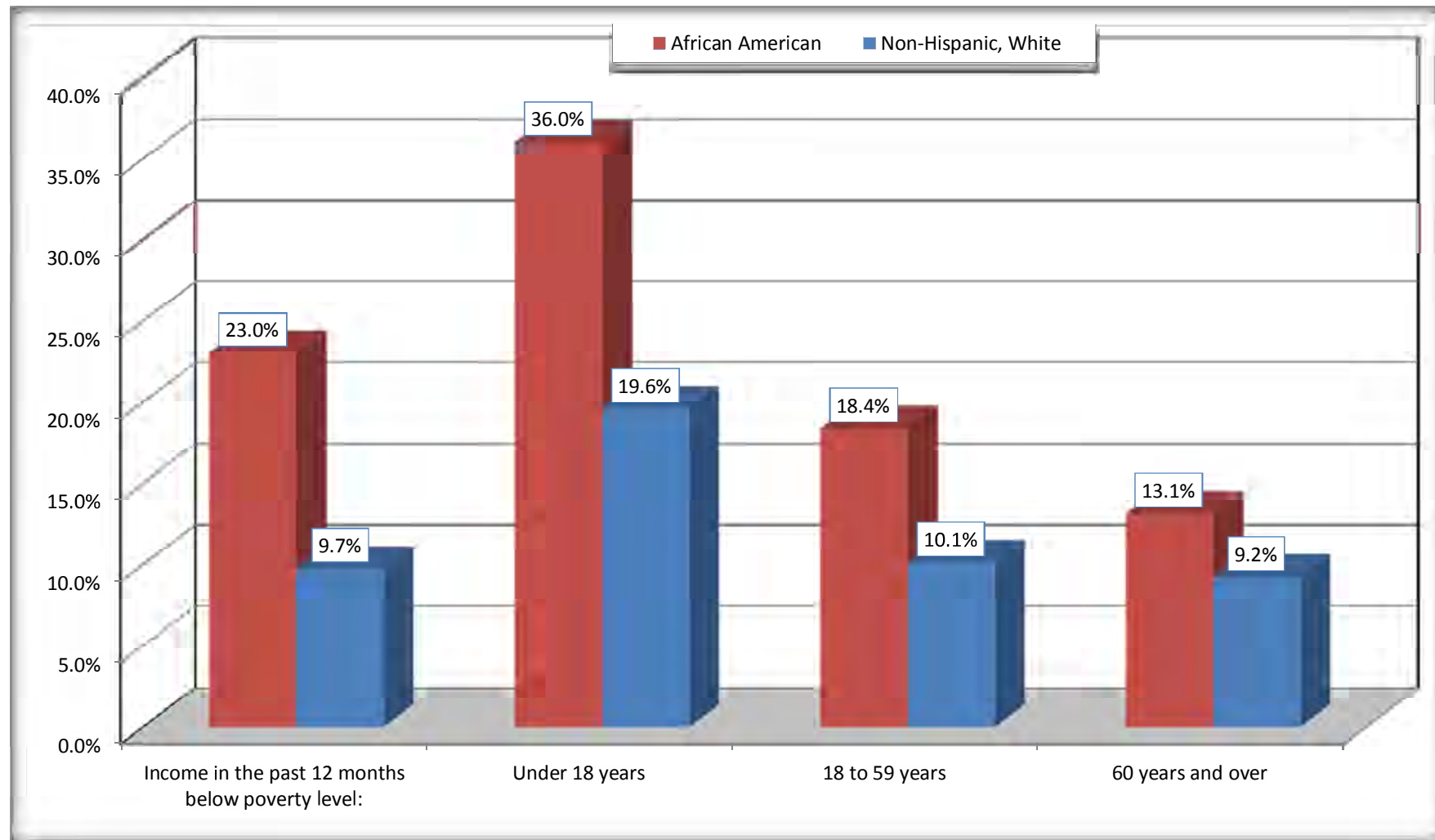
	Ferguson-Florissant School District, Missouri					
	African-American	Margin of Error (+/-)	% of AA By Age	White, Not Hispanic	Margin of Error (+/-)	% of NHW By Age
Total:	34,571	2,379	100.0%	27,141	1,689	100.0%
Income in the past 12 months below poverty level:	7,954	1,459	23.0%	2,640	885	9.7%
Under 18 years	3,768	NC	36.0%	850	NC	19.6%
18 to 59 years	3,579	673	18.4%	1,417	460	10.1%
60 years and over	607	NC	13.1%	373	NC	9.2%
Income in the past 12 months at or above poverty level:	26,617	2,271	77.0%	24,501	1,742	90.3%
Under 18 years	6,699	NC	64.0%	3,491	NC	80.4%
18 to 59 years	15,899	1,402	81.6%	12,618	1,090	89.9%
60 years and over	4,019	NC	86.9%	3,679	NC	90.8%

Source: U.S. Census Bureau, 2011-2013 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

Population Below Poverty in the Past 12 Months
Ferguson-Florissant School District, Missouri



Source: B17020 POVERTY STATUS IN THE PAST 12 MONTHS BY AGE - Universe: POPULATION FOR WHOM POVERTY STATUS IS DETERMINED
Data Set: 2011-2013 American Community Survey 3-Year Estimates

B19013. MEDIAN HOUSEHOLD INCOME IN THE PAST 12 MONTHS (IN 2013 INFLATION-ADJUSTED DOLLARS)

Data Set: 2011-2013 American Community Survey 3-Year Estimates

	Ferguson-Florissant School District, Missouri			
	African-American	Margin of Error (+/-)	White, Not Hispanic	Margin of Error (+/-)
Median household income in the past 12 months (in 2013 inflation-adjusted dollars)	\$ 38,760	\$ 2,475	\$ 52,781	\$ 3,652

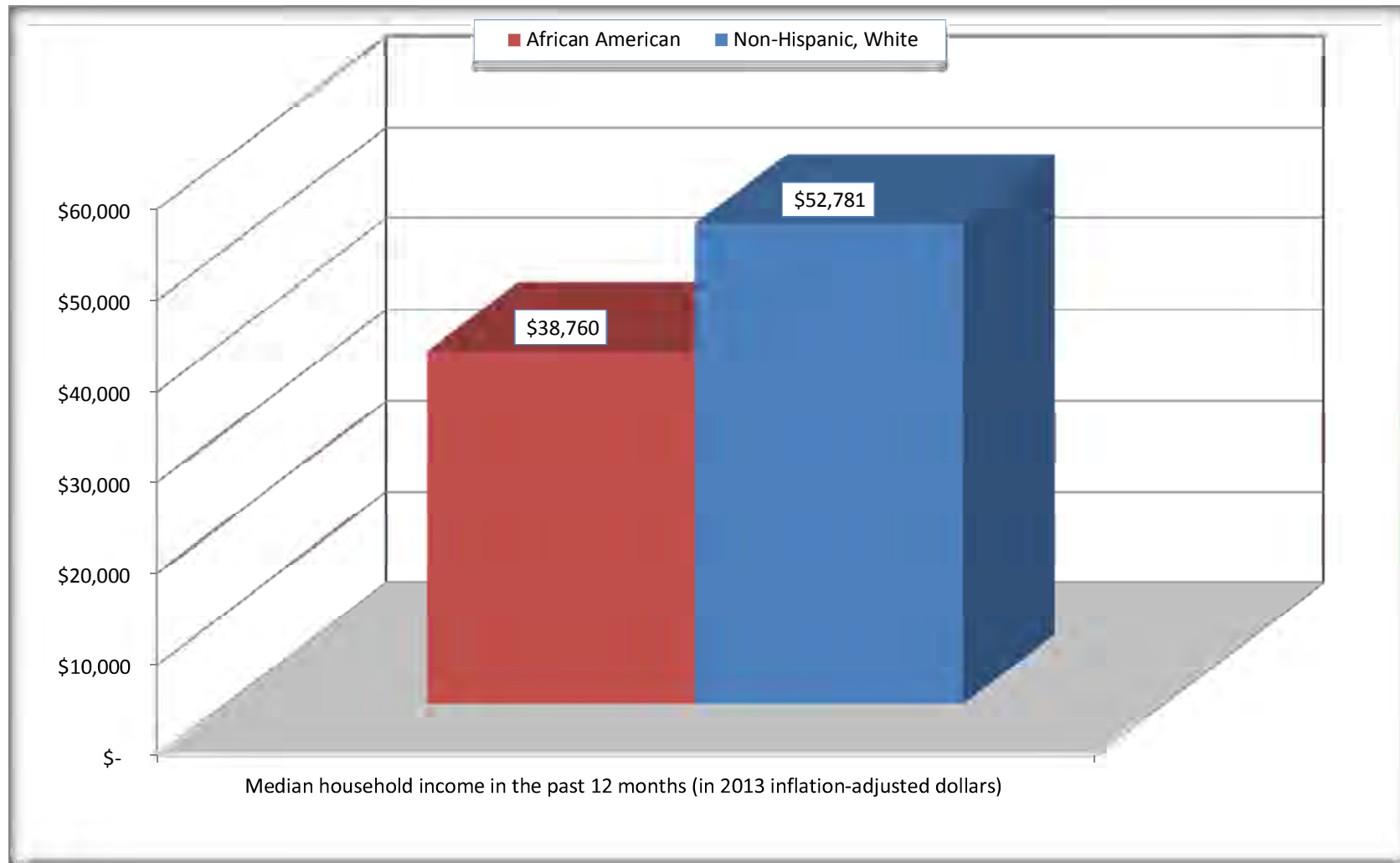
Source: U.S. Census Bureau, 2011-2013 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

Median Household Income in the Past 12 Months

Ferguson-Florissant School District, Missouri



Source: B19013. MEDIAN HOUSEHOLD INCOME IN THE PAST 12 MONTHS (IN 2013 INFLATION-ADJUSTED DOLLARS)
Data Set: 2011-2013 American Community Survey 3-Year Estimates

B19113. MEDIAN FAMILY INCOME IN THE PAST 12 MONTHS (IN 2013 INFLATION-ADJUSTED DOLLARS)

Data Set: 2011-2013 American Community Survey 3-Year Estimates

	Ferguson-Florissant School District, Missouri			
	African-American	Margin of Error (+/-)	White, Not Hispanic	Margin of Error (+/-)
Median family income in the past 12 months (in 2013 inflation-adjusted dollars)	\$ 44,099	\$ 3,178	\$ 66,086	\$ 3,976

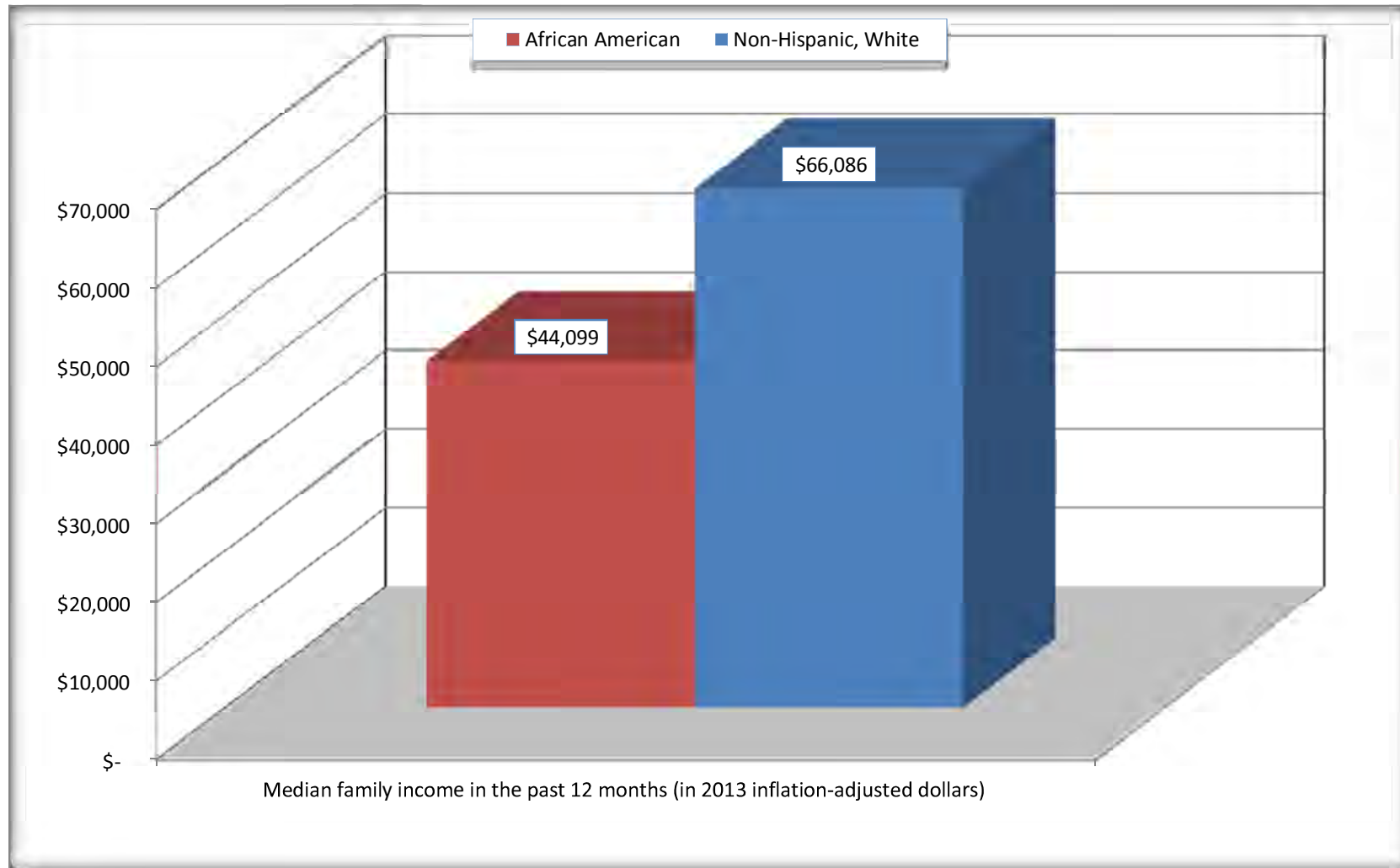
Source: U.S. Census Bureau, 2011-2013 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

Median Family Income in the Past 12 Months

Ferguson-Florissant School District, Missouri



Source: B19113. MEDIAN FAMILY INCOME IN THE PAST 12 MONTHS (IN 2013 INFLATION-ADJUSTED DOLLARS)
Data Set: 2011-2013 American Community Survey 3-Year Estimates

B19202. MEDIAN NONFAMILY HOUSEHOLD INCOME IN THE PAST 12 MONTHS (IN 2013 INFLATION-ADJUSTED DOLLARS)

Data Set: 2011-2013 American Community Survey 3-Year Estimates

	Ferguson-Florissant School District, Missouri			
	African-American	Margin of Error (+/-)	White, Not Hispanic	Margin of Error (+/-)
Median nonfamily household income in the past 12 months (in 2013 inflation-adjusted dollars)	\$ 28,544	\$ 4,156	\$ 30,691	\$ 5,731

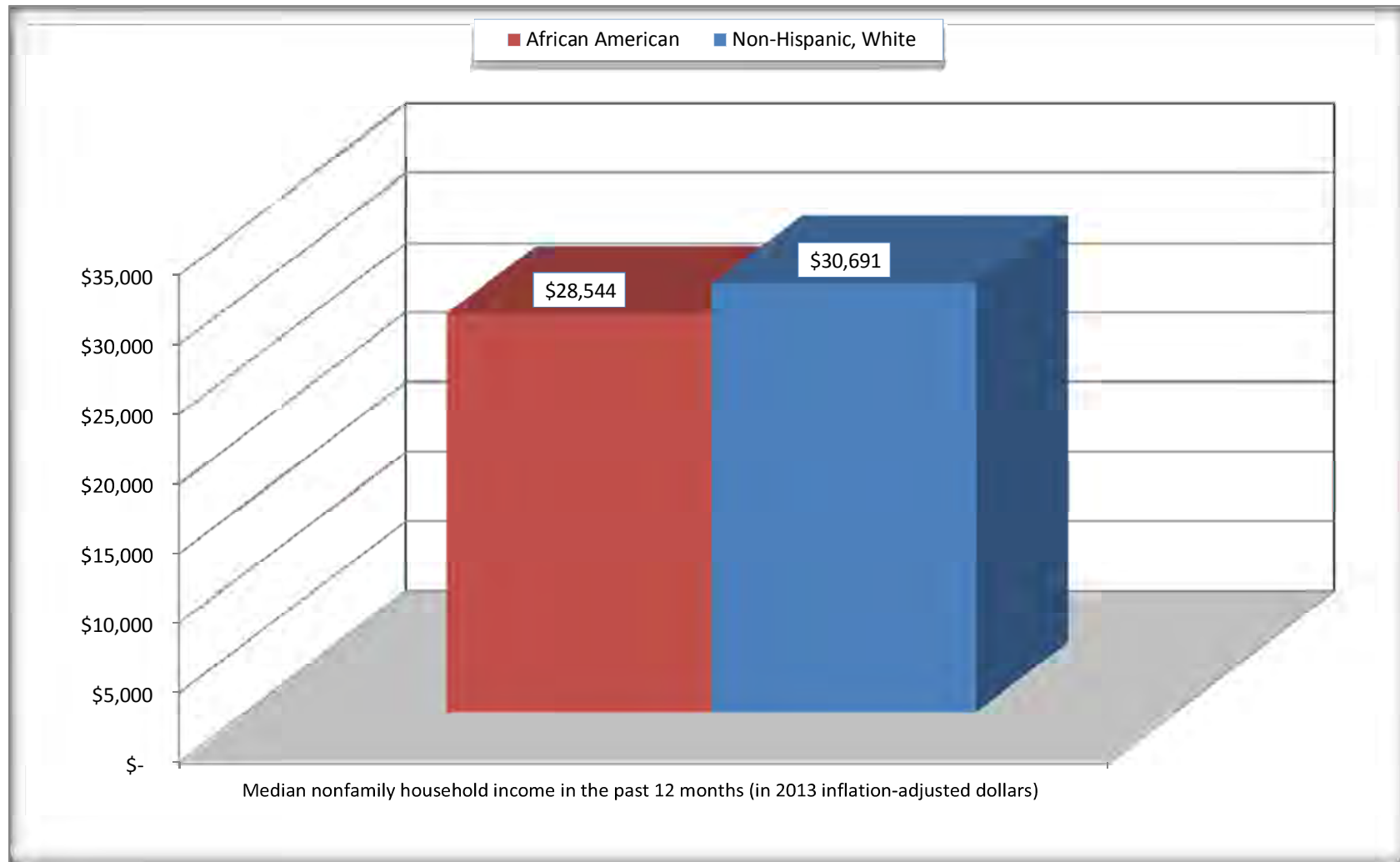
Source: U.S. Census Bureau, 2011-2013 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

Median Non-Family Income in the Past 12 Months

Ferguson-Florissant School District, Missouri



Source: B19202. MEDIAN NONFAMILY HOUSEHOLD INCOME IN THE PAST 12 MONTHS (IN 2013 INFLATION-ADJUSTED DOLLARS)
Data Set: 2011-2013 American Community Survey 3-Year Estimates

B20017. MEDIAN EARNINGS IN THE PAST 12 MONTHS (IN 2013 INFLATION-ADJUSTED DOLLARS) BY SEX BY WORK EXPERIENCE IN THE PAST 12 MONTHS FOR THE POPULATION 16 YEARS AND OVER WITH EARNINGS IN THE PAST 12 MONTHS

Data Set: 2011-2013 American Community Survey 3-Year Estimates

	Ferguson-Florissant School District, Missouri			
	African-American	Margin of Error (+/-)	White, Not Hispanic	Margin of Error (+/-)
Median earnings in the past 12 months (in 2013 inflation-adjusted dollars) --				
Total:	\$ 26,671	\$ 1,916	\$ 32,202	\$ 2,518
Male --				
Total	\$ 26,748	\$ 4,922	\$ 34,903	\$ 3,959
Worked full-time, year-round in the past 12 months	\$ 37,767	\$ 4,933	\$ 42,813	\$ 4,322
Other	\$ 7,975	\$ 2,459	\$ 11,609	\$ 2,911
Female --				
Total	\$ 26,625	\$ 2,206	\$ 30,453	\$ 2,970
Worked full-time, year-round in the past 12 months	\$ 33,087	\$ 2,795	\$ 46,409	\$ 2,272
Other	\$ 8,783	\$ 2,477	\$ 11,348	\$ 1,978

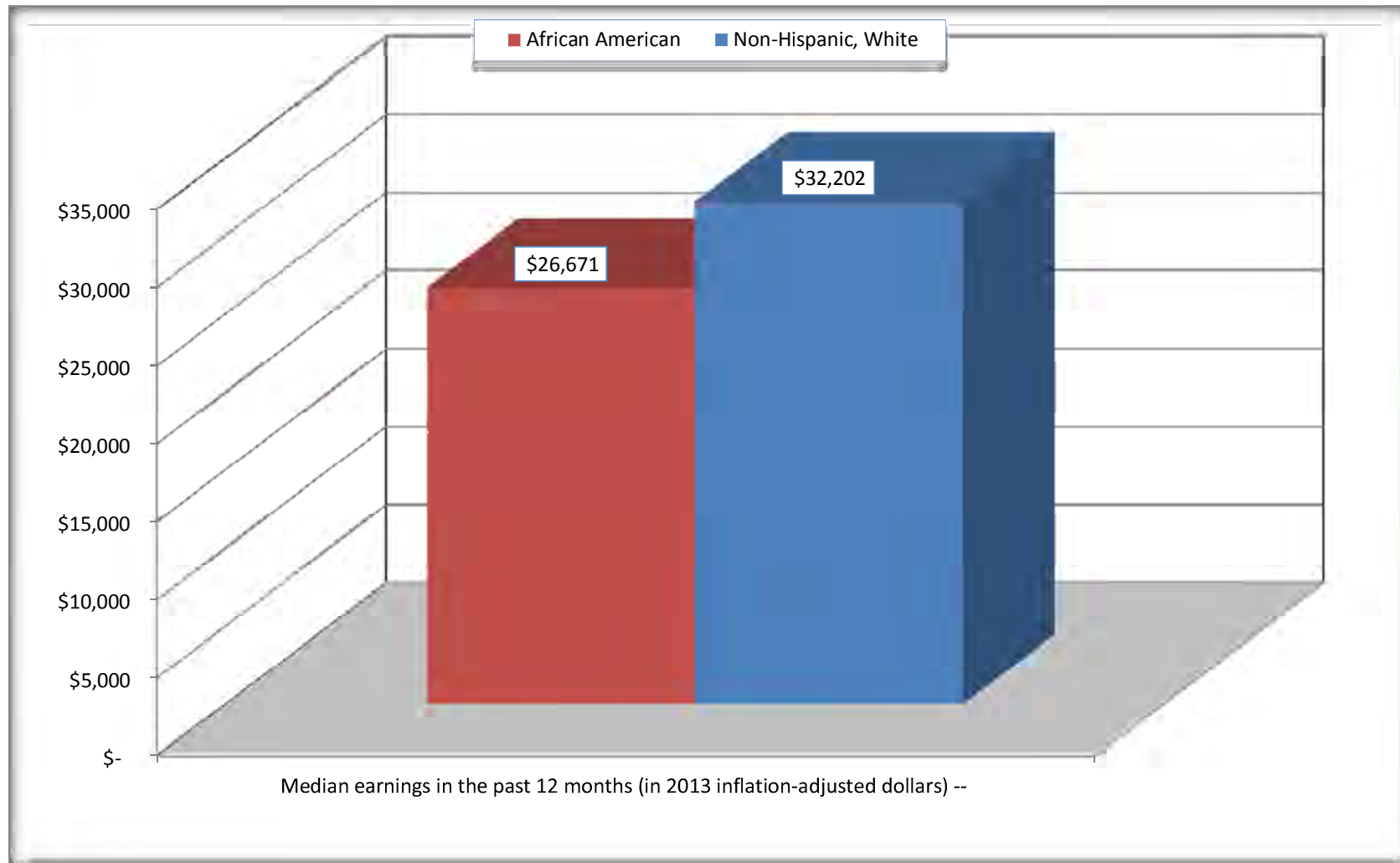
Source: U.S. Census Bureau, 2011-2013 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

Median earnings in the Past 12 Months (16 Years and Over with Earnings)

Ferguson-Florissant School District, Missouri



Source: B20017. MEDIAN EARNINGS IN THE PAST 12 MONTHS (IN 2013 INFLATION-ADJUSTED DOLLARS) BY SEX BY WORK EXPERIENCE IN THE PAST 12 MONTHS FOR THE POPULATION 16 YEARS AND OVER WITH EARNINGS IN THE PAST 12 MONTHS

Data Set: 2011-2013 American Community Survey 3-Year Estimates

C21001. SEX BY AGE BY VETERAN STATUS FOR THE CIVILIAN POPULATION 18 YEARS AND OVER

Data Set: 2011-2013 American Community Survey 3-Year Estimates

	Ferguson-Florissant School District, Missouri					
	African-American	Margin of Error (+/-)	% of AA Total	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total
Total:	24,313	1,513	100.0%	23,242	1,413	100.0%
Veteran	2,380	NC	9.8%	2,728	NC	11.7%
Nonveteran	21,933	NC	90.2%	20,514	NC	88.3%
Male:	9,582	946	39.4%	11,033	870	47.5%
18 to 64 years:	8,358	954	34.4%	8,499	826	36.6%
Veteran	1,371	377	5.6%	1,051	272	4.5%
Nonveteran	6,987	869	28.7%	7,448	748	32.0%
65 years and over:	1,224	291	5.0%	2,534	363	10.9%
Veteran	755	261	3.1%	1,593	262	6.9%
Nonveteran	469	190	1.9%	941	271	4.0%
Female:	14,731	1,029	60.6%	12,209	808	52.5%
18 to 64 years:	12,879	978	53.0%	8,348	669	35.9%
Veteran	240	153	1.0%	66	49	0.3%
Nonveteran	12,639	957	52.0%	8,282	661	35.6%
65 years and over:	1,852	367	7.6%	3,861	534	16.6%
Veteran	14	23	0.1%	18	28	0.1%
Nonveteran	1,838	370	7.6%	3,843	535	16.5%

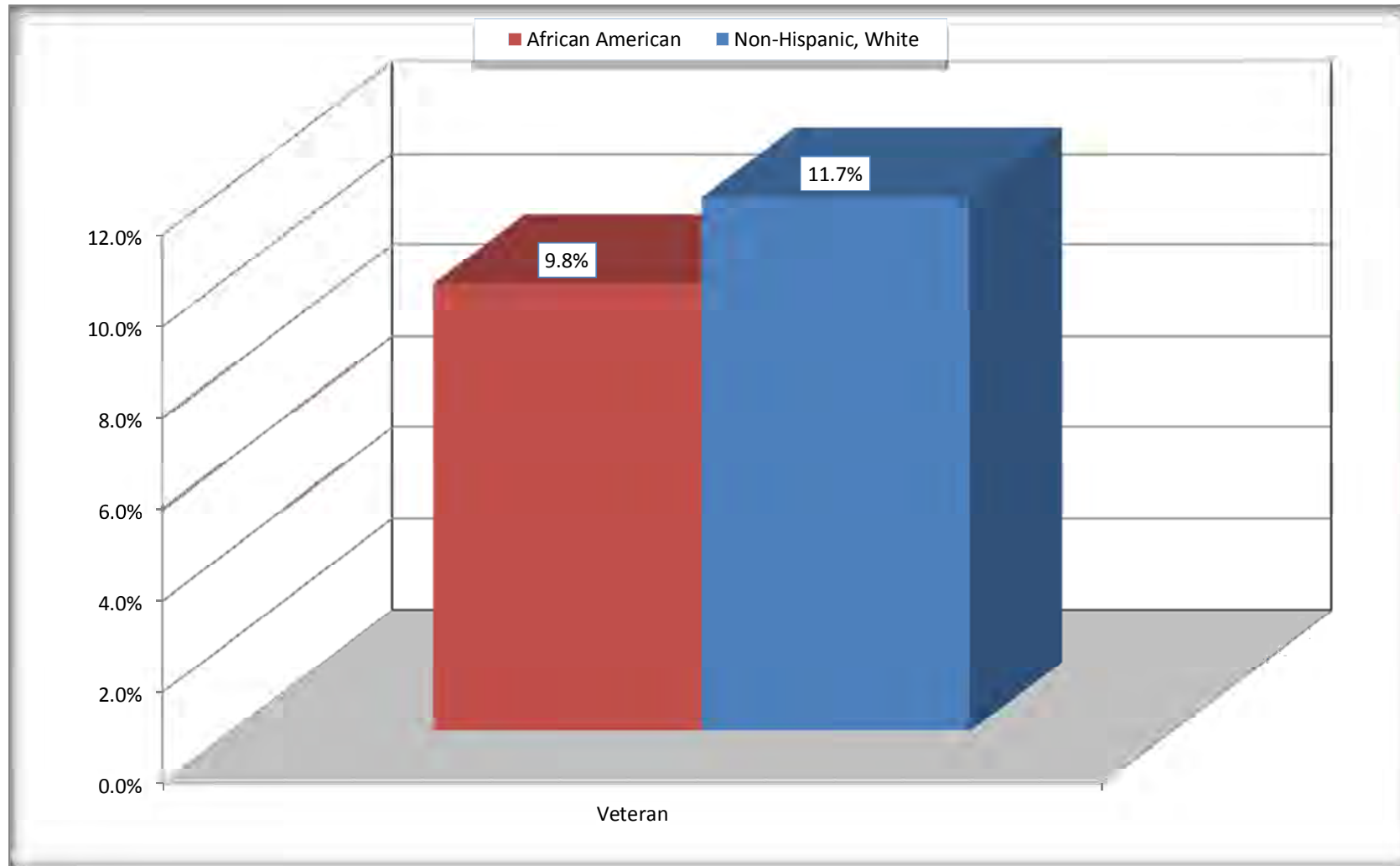
Source: U.S. Census Bureau, 2011-2013 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

Veterans in the Civilian Population 18 Years and Over

Ferguson-Florissant School District, Missouri



Source: C21001. SEX BY AGE BY VETERAN STATUS FOR THE CIVILIAN POPULATION 18 YEARS AND OVER
Data Set: 2011-2013 American Community Survey 3-Year Estimates

B22005. RECEIPT OF FOOD STAMPS/SNAP IN THE PAST 12 MONTHS BY RACE OF HOUSEHOLDER

Data Set: 2011-2013 American Community Survey 3-Year Estimates

	Ferguson-Florissant School District, Missouri					
	African-American	Margin of Error (+/-)	% of AA Total	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total
Total:	13,669	876	100.0%	13,084	757	100.0%
HH received Food Stamps/SNAP in the past 12 months	3,661	519	26.8%	1,307	365	10.0%
HH did not receive Food Stamps/SNAP in the past 12 months	10,008	809	73.2%	11,777	772	90.0%

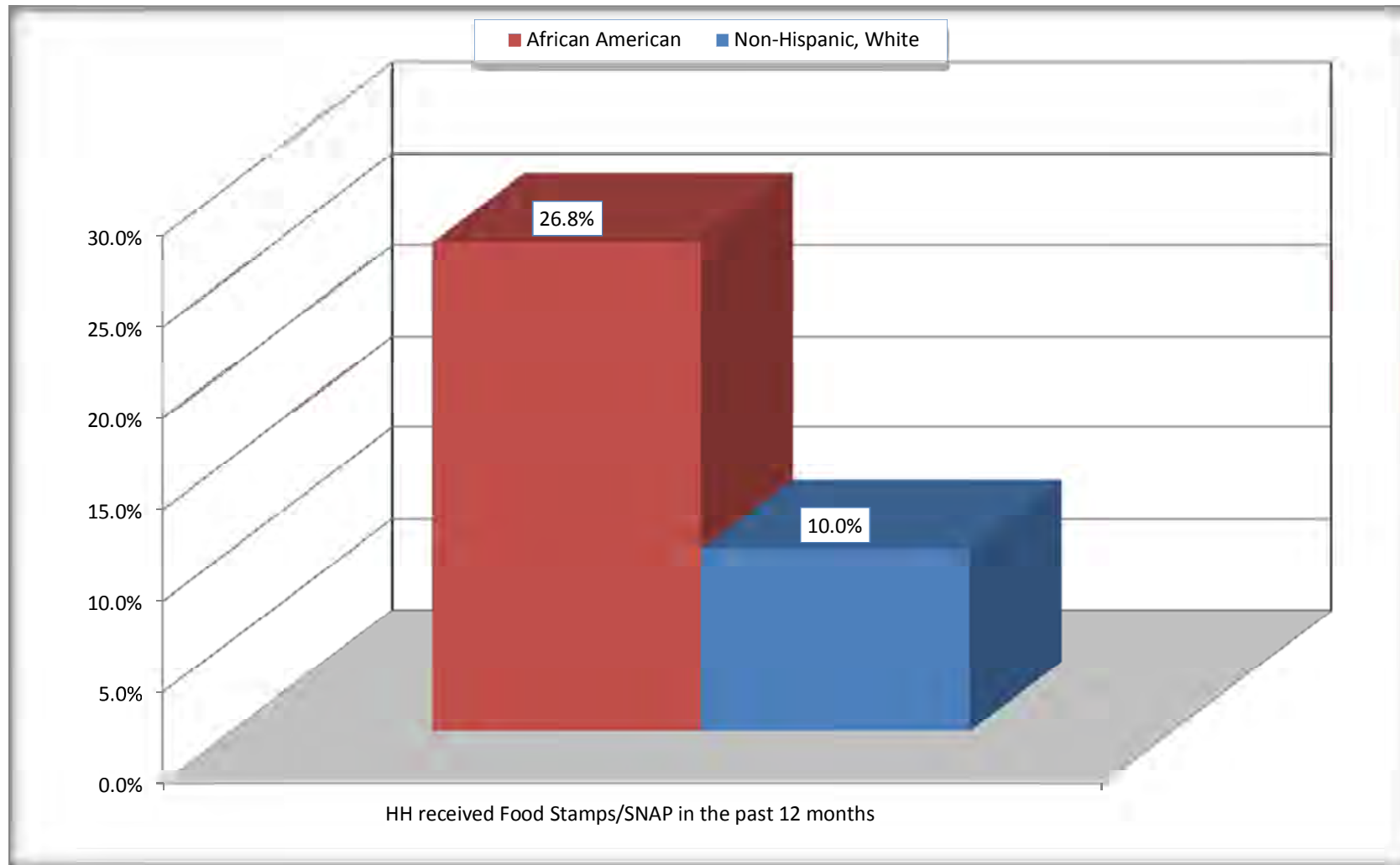
Source: U.S. Census Bureau, 2011-2013 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

Receipt of Food Stamps/SNAP in the Past 12 Months by Household

Ferguson-Florissant School District, Missouri



Source: B22005. RECEIPT OF FOOD STAMPS/SNAP IN THE PAST 12 MONTHS BY RACE OF HOUSEHOLDER
Data Set: 2011-2013 American Community Survey 3-Year Estimates

C23002. SEX BY AGE BY EMPLOYMENT STATUS FOR THE POPULATION 16 YEARS AND OVER

Data Set: 2011-2013 American Community Survey 3-Year Estimates

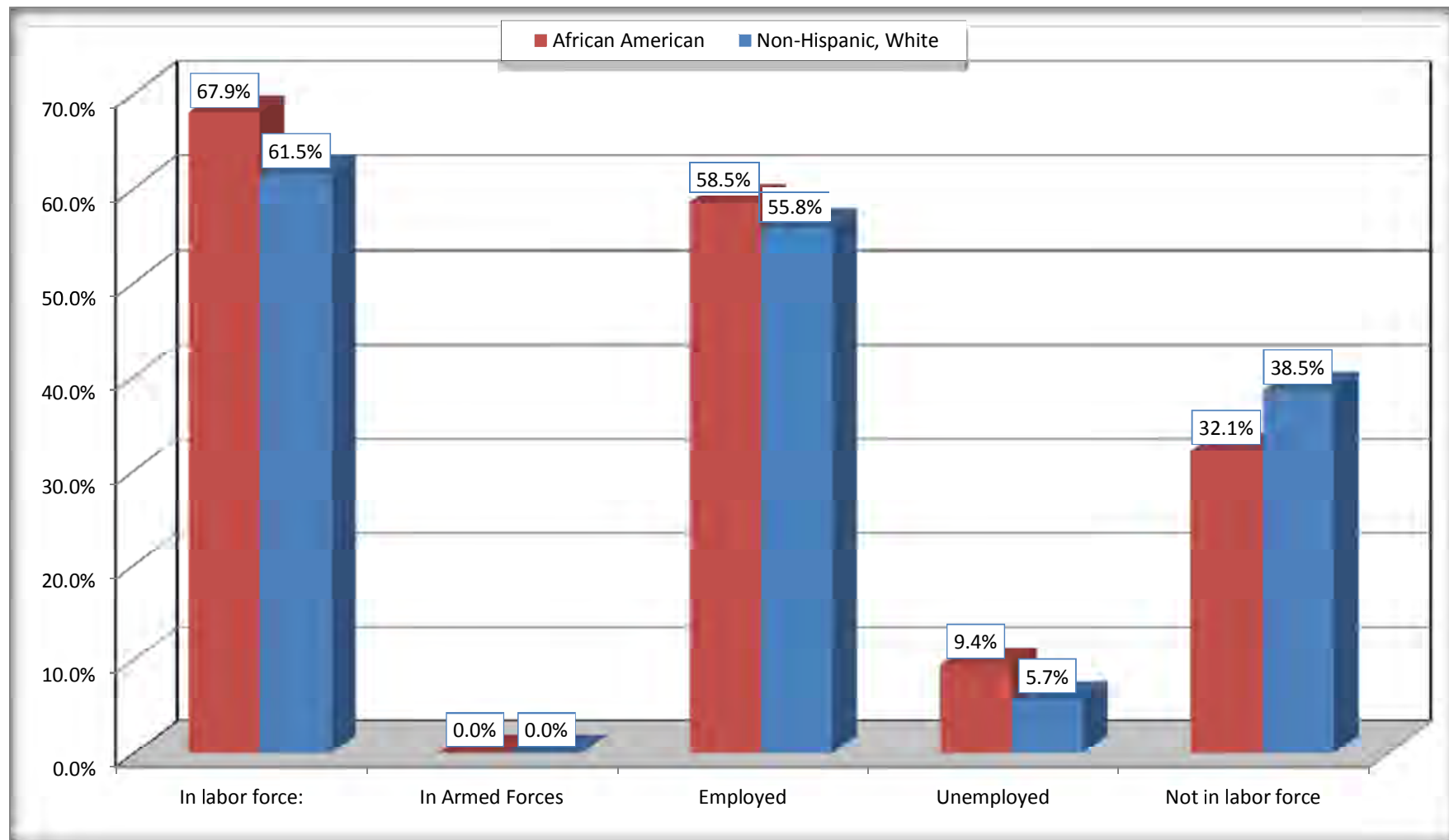
	Ferguson-Florissant School District, Missouri					
	African-American	Margin of Error (+/-)	% of AA Total	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total
Total:	25,544	1,629	100.0%	23,813	1,403	100.0%
In labor force:	17,343	NC	67.9%	14,642	NC	61.5%
In Armed Forces	0	NC	0.0%	0	NC	0.0%
Civilian:	16,773	NC	65.7%	13,774	NC	57.8%
Employed	14,948	NC	58.5%	13,282	NC	55.8%
Unemployed	2,395	NC	9.4%	1,360	NC	5.7%
Not in labor force	8,201	NC	32.1%	9,171	NC	38.5%
Male:	10,114	1,035	39.6%	11,401	867	47.9%
16 to 64 years:	8,890	1,047	34.8%	8,867	835	37.2%
In labor force:	6,768	750	26.5%	7,253	717	30.5%
In Armed Forces	0	104	0.0%	0	104	0.0%
Civilian:	6,768	750	26.5%	7,253	717	30.5%
Employed	5,521	665	21.6%	6,492	688	27.3%
Unemployed	1,247	414	4.9%	761	246	3.2%
Not in labor force	2,122	595	8.3%	1,614	407	6.8%
65 years and over:	1,224	291	4.8%	2,534	363	10.6%
In labor force:	379	194	1.5%	416	156	1.7%
Employed	361	191	1.4%	400	153	1.7%
Unemployed	18	33	0.1%	16	31	0.1%
Not in labor force	845	259	3.3%	2,118	338	8.9%

	Ferguson-Florissant School District, Missouri					
	African-American	Margin of Error (+/-)	% of AA Total	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total
Female:	15,430	1,126	60.4%	12,412	807	52.1%
16 to 64 years:	13,578	1,090	53.2%	8,551	683	35.9%
In labor force:	10,005	955	39.2%	6,521	599	27.4%
In Armed Forces	0	104	0.0%	0	104	0.0%
Civilian:	10,005	955	39.2%	6,521	599	27.4%
Employed	8,875	792	34.7%	5,959	537	25.0%
Unemployed	1,130	374	4.4%	562	266	2.4%
Not in labor force	3,573	561	14.0%	2,030	360	8.5%
65 years and over:	1,852	367	7.3%	3,861	534	16.2%
In labor force:	191	91	0.7%	452	158	1.9%
Employed	191	91	0.7%	431	146	1.8%
Unemployed	0	104	0.0%	21	34	0.1%
Not in labor force	1,661	349	6.5%	3,409	502	14.3%

Source: U.S. Census Bureau, 2011-2013 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

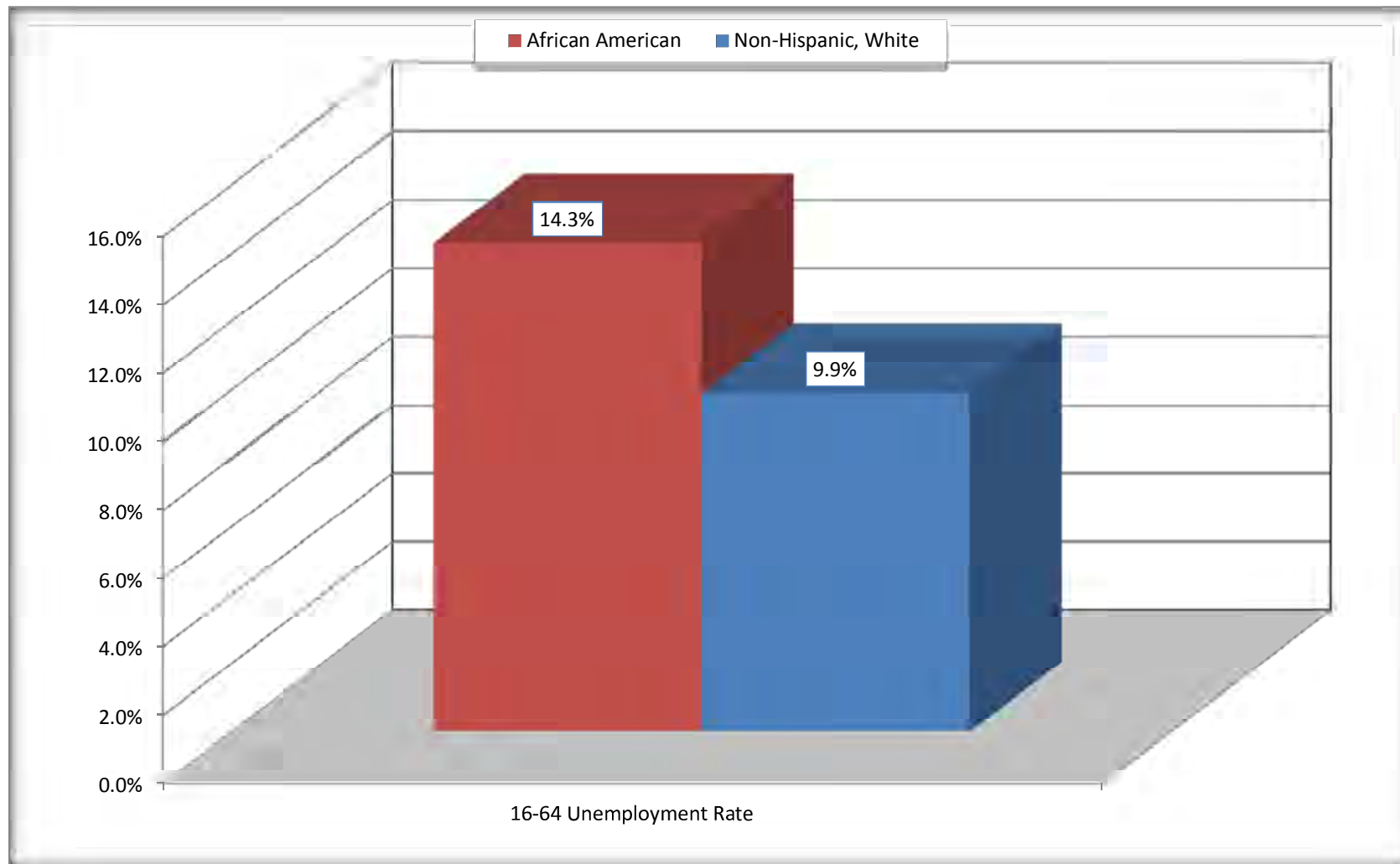
Employment Status for the Population 16 years and over**Ferguson-Florissant School District, Missouri**

Source: C23002. SEX BY AGE BY EMPLOYMENT STATUS FOR THE POPULATION 16 YEARS AND OVER

Data Set: 2011-2013 American Community Survey 3-Year Estimates

**Unemployment of Working Age Population (Ages 16 to 64)
(As a Percent of 16-64 Civilian Labor Force)**

Ferguson-Florissant School District, Missouri



Source: C23002. SEX BY AGE BY EMPLOYMENT STATUS FOR THE POPULATION 16 YEARS AND OVER
Data Set: 2011-2013 American Community Survey 3-Year Estimates

C24010. SEX BY OCCUPATION FOR THE CIVILIAN EMPLOYED POPULATION 16 YEARS AND OVER

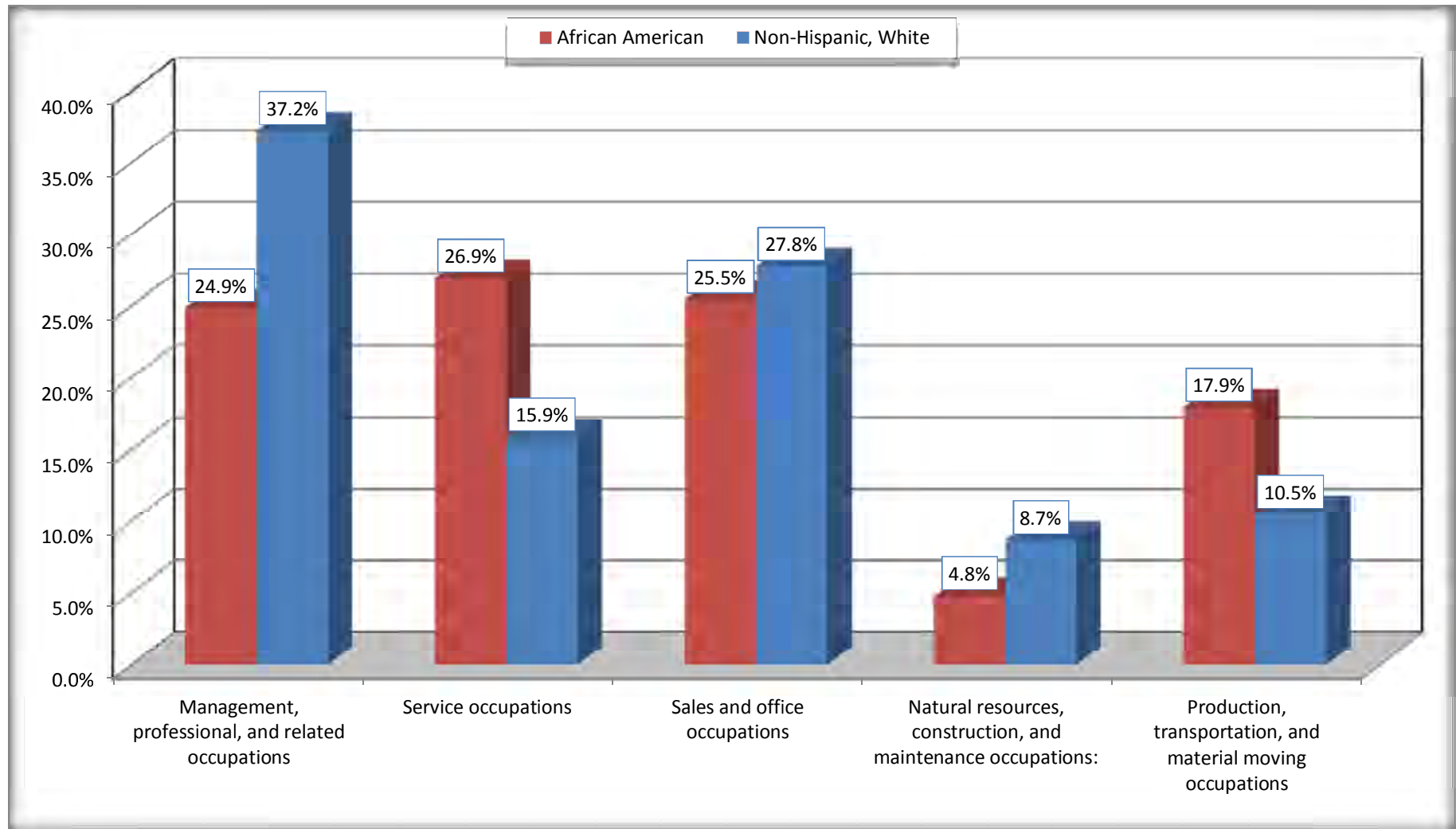
Data Set: 2011-2013 American Community Survey 3-Year Estimates

	Ferguson-Florissant School District, Missouri					
	African-American	Margin of Error (+/-)	% of AA Total	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total
Total:	14,948	1,138	100.0%	13,282	984	100.0%
Management, professional, and related occupations	3,718	NC	24.9%	4,947	NC	37.2%
Service occupations	4,028	NC	26.9%	2,106	NC	15.9%
Sales and office occupations	3,806	NC	25.5%	3,687	NC	27.8%
Natural resources, construction, and maintenance occupations:	716	NC	4.8%	1,152	NC	8.7%
Production, transportation, and material moving occupations	2,680	NC	17.9%	1,390	NC	10.5%
Male:	5,882	697	39.3%	6,892	656	51.9%
Management, business, science, and arts occupations:	712	258	4.8%	2,256	440	17.0%
Service occupations	1,532	355	10.2%	748	192	5.6%
Sales and office occupations	953	339	6.4%	1,625	340	12.2%
Natural resources, construction, and maintenance occupations:	691	297	4.6%	1,116	329	8.4%
Production, transportation, and material moving occupations	1,994	446	13.3%	1,147	299	8.6%
Female:	9,066	795	60.7%	6,390	576	48.1%
Management, professional, and related occupations	3,006	562	20.1%	2,691	396	20.3%
Service occupations	2,496	464	16.7%	1,358	400	10.2%
Sales and office occupations	2,853	468	19.1%	2,062	377	15.5%
Natural resources, construction, and maintenance occupations:	25	42	0.2%	36	44	0.3%
Production, transportation, and material moving occupations	686	298	4.6%	243	147	1.8%

Source: U.S. Census Bureau, 2011-2013 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

Occupation for the Civilian Employed 16 Years and Over Population**Ferguson-Florissant School District, Missouri**

Source: C24010. SEX BY OCCUPATION FOR THE CIVILIAN EMPLOYED POPULATION 16 YEARS AND OVER
Data Set: 2011-2013 American Community Survey 3-Year Estimates

B25003. TENURE - Universe: OCCUPIED HOUSING UNITS

Data Set: 2011-2013 American Community Survey 3-Year Estimates

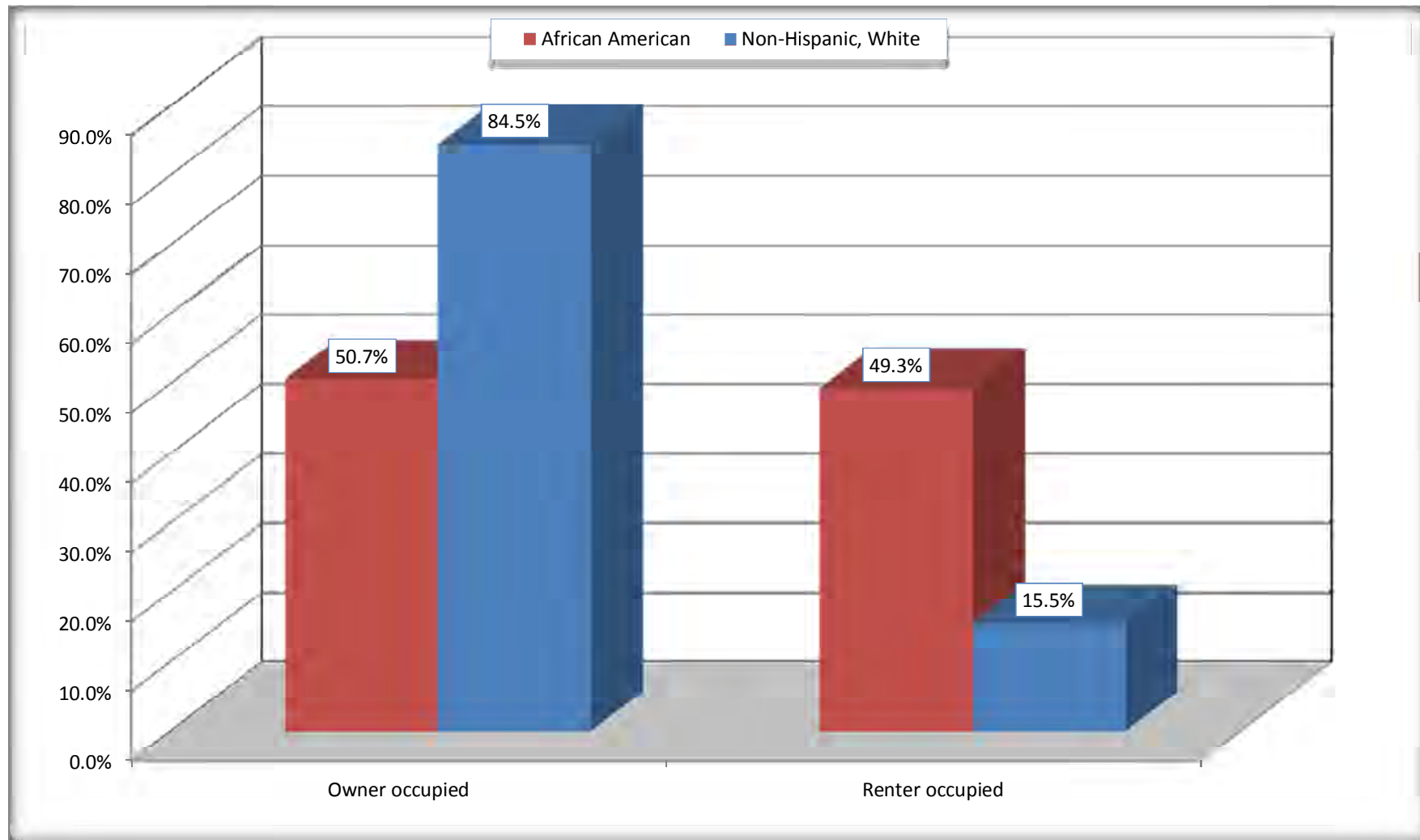
	Ferguson-Florissant School District, Missouri					
	African-American	Margin of Error (+/-)	% of AA Total	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total
Total:	13,669	876	100.0%	13,084	757	100.0%
Owner occupied	6,924	598	50.7%	11,053	729	84.5%
Renter occupied	6,745	735	49.3%	2,031	423	15.5%

Source: U.S. Census Bureau, 2011-2013 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.h>

Home Owners and Renters by Household
Ferguson-Florissant School District, Missouri



Source: B25003. TENURE - Universe: OCCUPIED HOUSING UNITS
Data Set: 2011-2013 American Community Survey 3-Year Estimates

B25014. OCCUPANTS PER ROOM - Universe: OCCUPIED HOUSING UNITS

Data Set: 2011-2013 American Community Survey 3-Year Estimates

	Ferguson-Florissant School District, Missouri					
	African-American	Margin of Error (+/-)	% of AA Total	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total
Total:	13,669	876	100.0%	13,084	757	100.0%
1.00 or less occupants per room	13,620	879	99.6%	12,849	778	98.2%
1.01 or more occupants per room	49	45	0.4%	235	157	1.8%

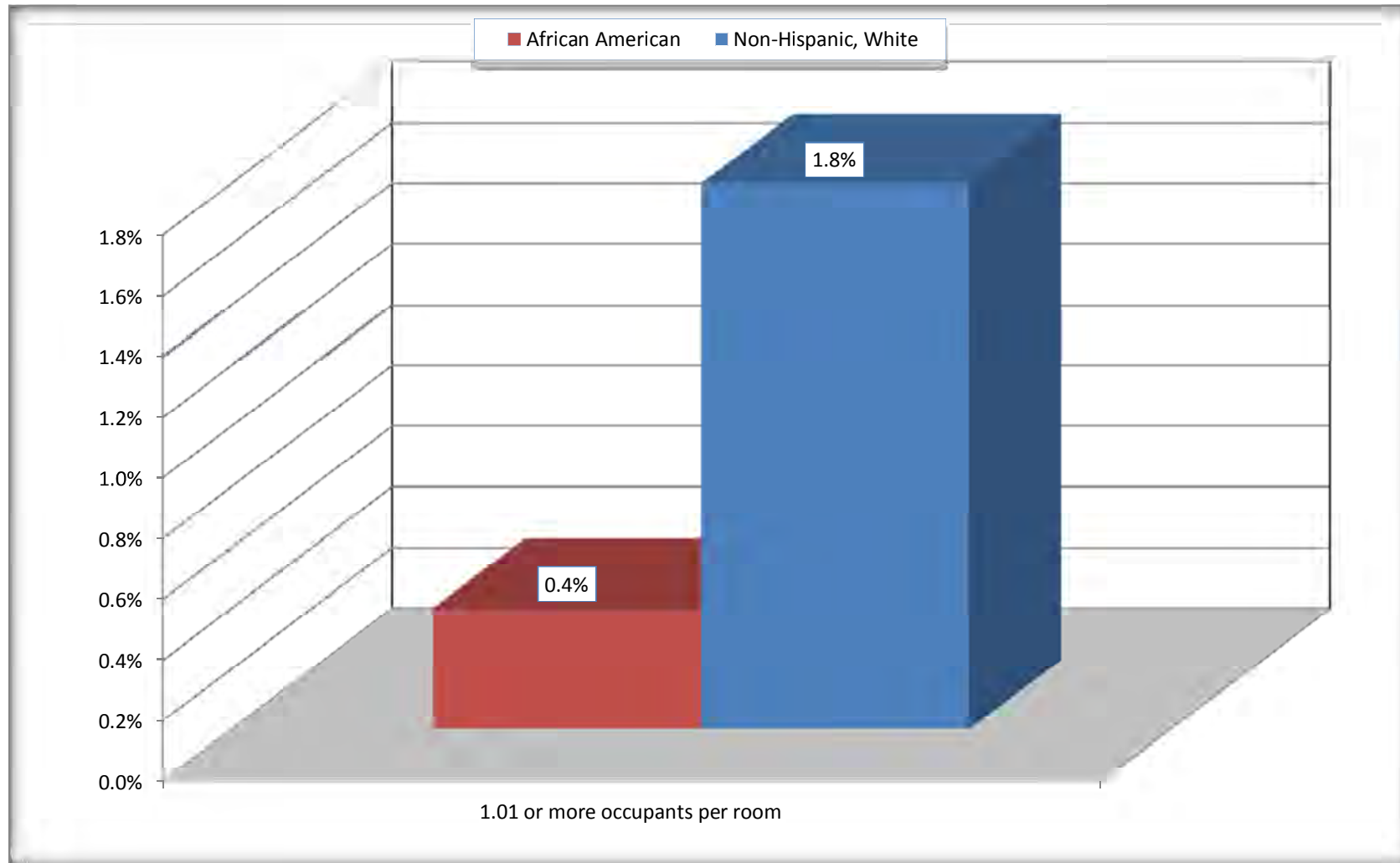
Source: U.S. Census Bureau, 2011-2013 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.ht>

More than One Person per Room (Crowding) by Household

Ferguson-Florissant School District, Missouri



Source: B25014. OCCUPANTS PER ROOM - Universe: OCCUPIED HOUSING UNITS
Data Set: 2011-2013 American Community Survey 3-Year Estimates

B18101: AGE BY DISABILITY STATUS

Data Set: 2011-2013 American Community Survey 3-Year Estimates

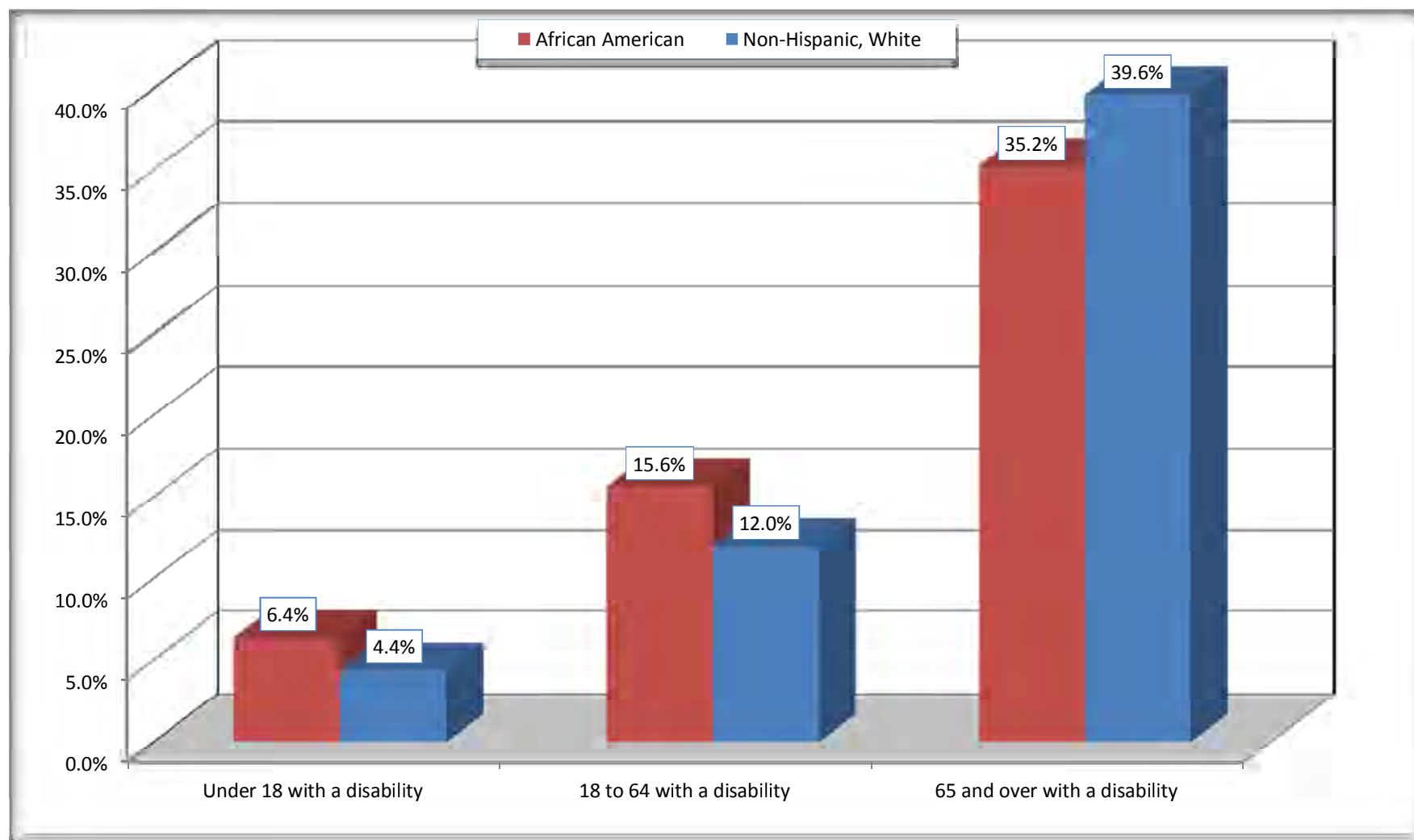
Exhibit D

	Ferguson-Florissant School District, Missouri					
	African-American	Margin of Error (+/-)	% of AA Total	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total
Total:	34,880	2,452	100.0%	27,246	1,700	100.0%
Under 18 years:	10,773	1,560	30.9%	4,343	743	15.9%
With a disability	686	378	2.0%	190	113	0.7%
No disability	10,087	1,513	28.9%	4,153	705	15.2%
18 to 64 years:	21,198	1,420	60.8%	16,748	1,231	61.5%
With a disability	3,309	592	9.5%	2,006	452	7.4%
No disability	17,889	1,289	51.3%	14,742	1,157	54.1%
65 years and over:	2,909	521	8.3%	6,155	751	22.6%
With a disability	1,025	281	2.9%	2,439	540	9.0%
No disability	1,884	394	5.4%	3,716	505	13.6%

Source: U.S. Census Bureau, 2011-2013 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

Disability by Age**Ferguson-Florissant School District, Missouri**

Source: B18101: AGE BY DISABILITY STATUS

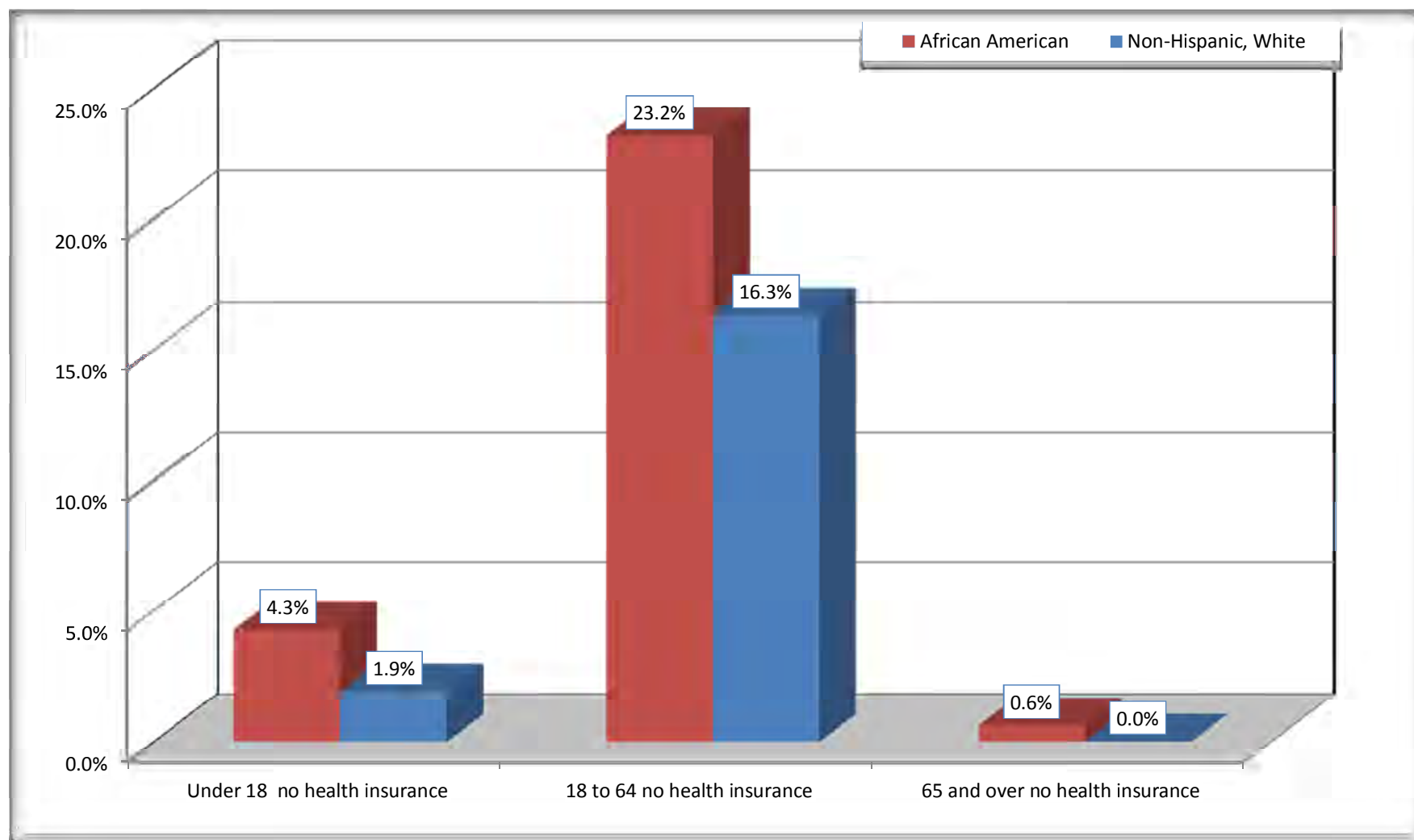
Data Set: 2011-2013 American Community Survey 3-Year Estimates

	Ferguson-Florissant School District, Missouri					
	African-American	Margin of Error (+/-)	% of AA Total	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total
Total:	34,880	2,452	100.0%	27,246	1,700	100.0%
Under 18 years:	10,773	1,560	30.9%	4,343	743	15.9%
With health insurance coverage	10,313	1,566	29.6%	4,260	747	15.6%
No health insurance coverage	460	210	1.3%	83	78	0.3%
18 to 64 years:	21,198	1,420	60.8%	16,748	1,231	61.5%
With health insurance coverage	16,281	1,402	46.7%	14,012	1,105	51.4%
No health insurance coverage	4,917	665	14.1%	2,736	499	10.0%
65 years and over:	2,909	521	8.3%	6,155	751	22.6%
With health insurance coverage	2,891	515	8.3%	6,155	751	22.6%
No health insurance coverage	18	23	0.1%	0	104	0.0%

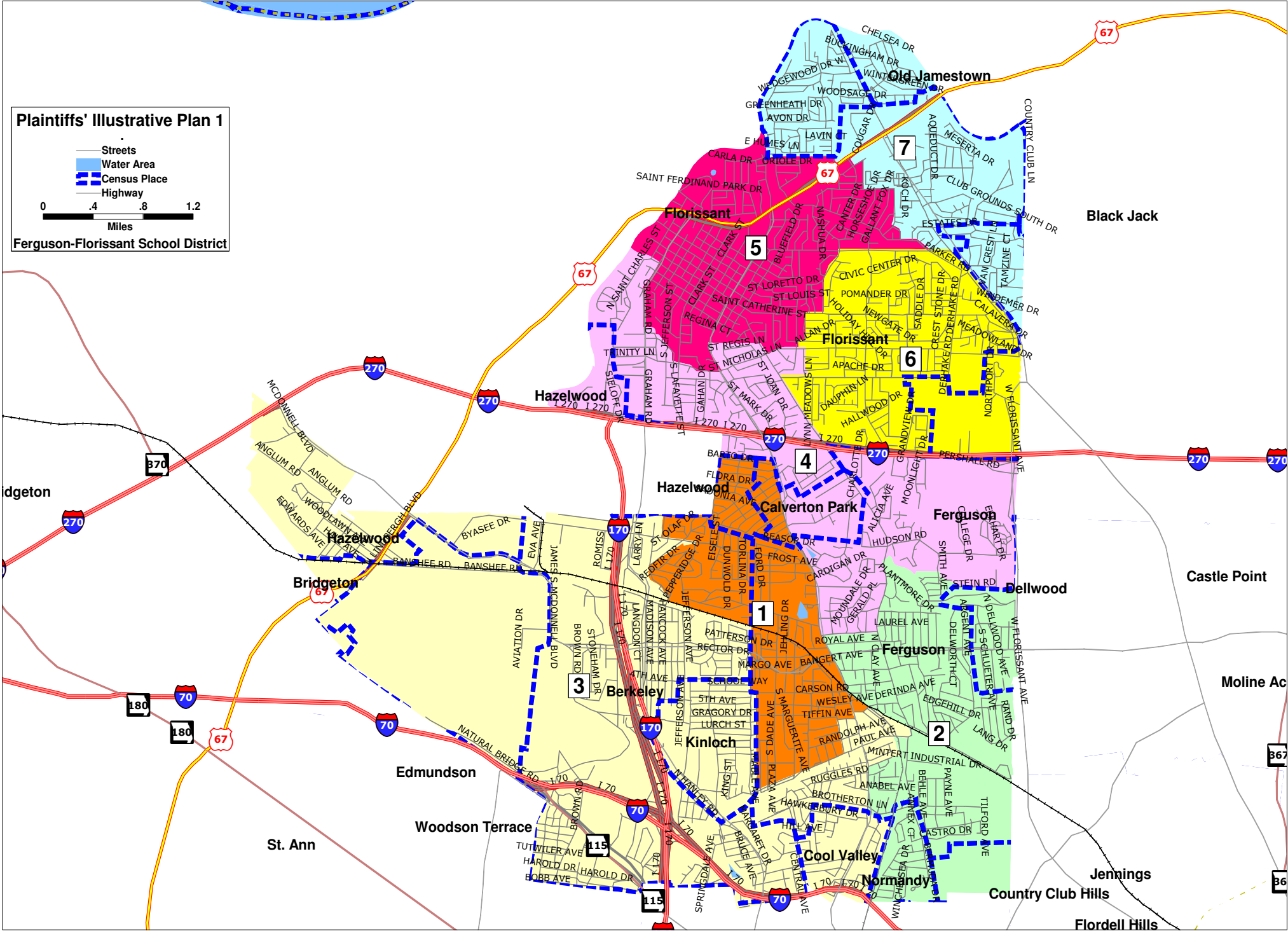
Source: U.S. Census Bureau, 2011-2013 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.
<http://www.census.gov/acs/www/UseData/index.htm>

Lack of Health Insurance Coverage by Age
Ferguson-Florissant School District, Missouri



Source: C27001B: HEALTH INSURANCE COVERAGE STATUS BY AGE
Data Set: 2011-2013 American Community Survey 3-Year Estimates



Population Summary Report

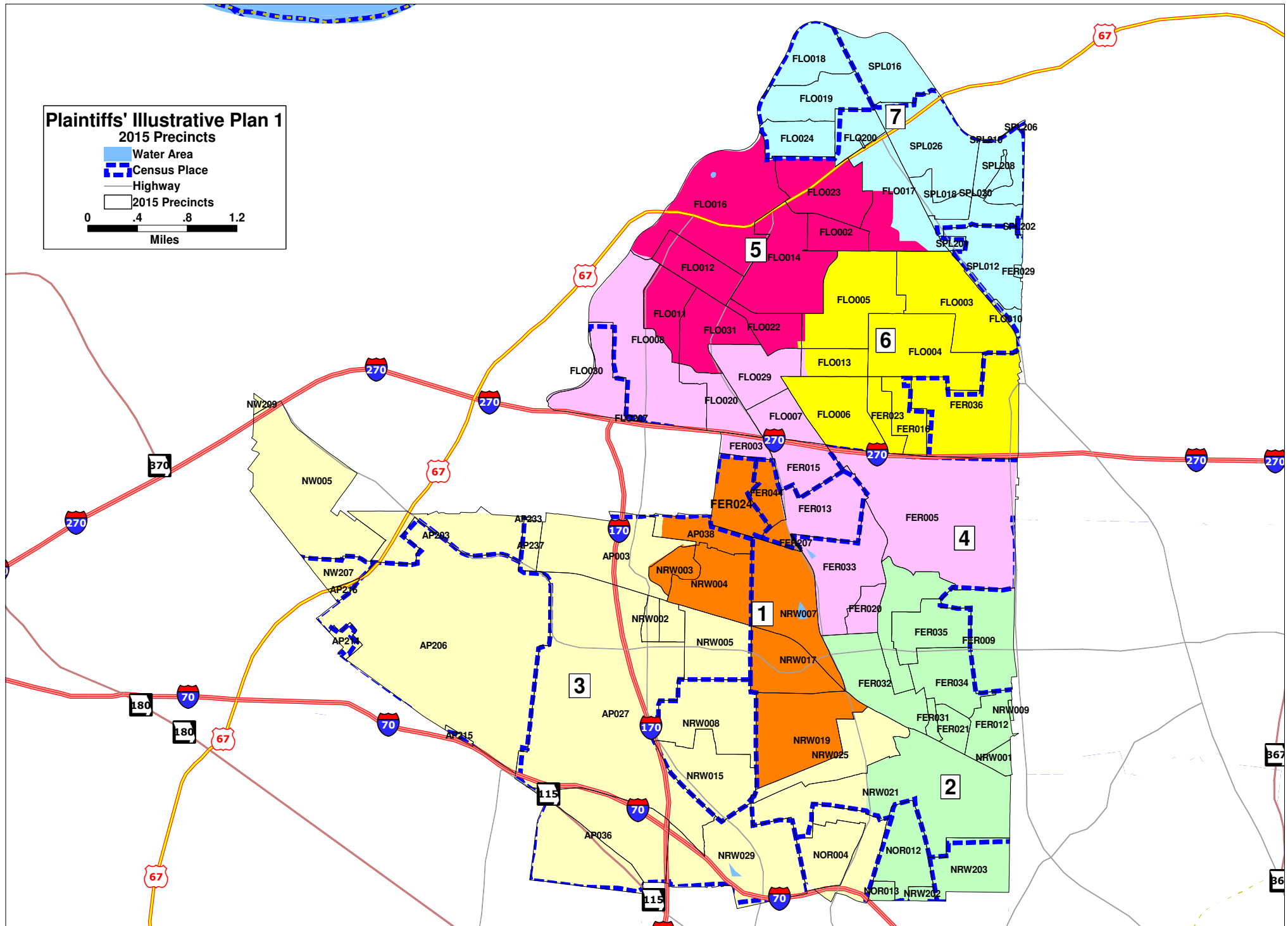
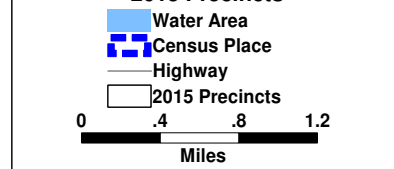
Ferguson-Florissant School District, MO – Plaintiffs' Illustrative Plan 1

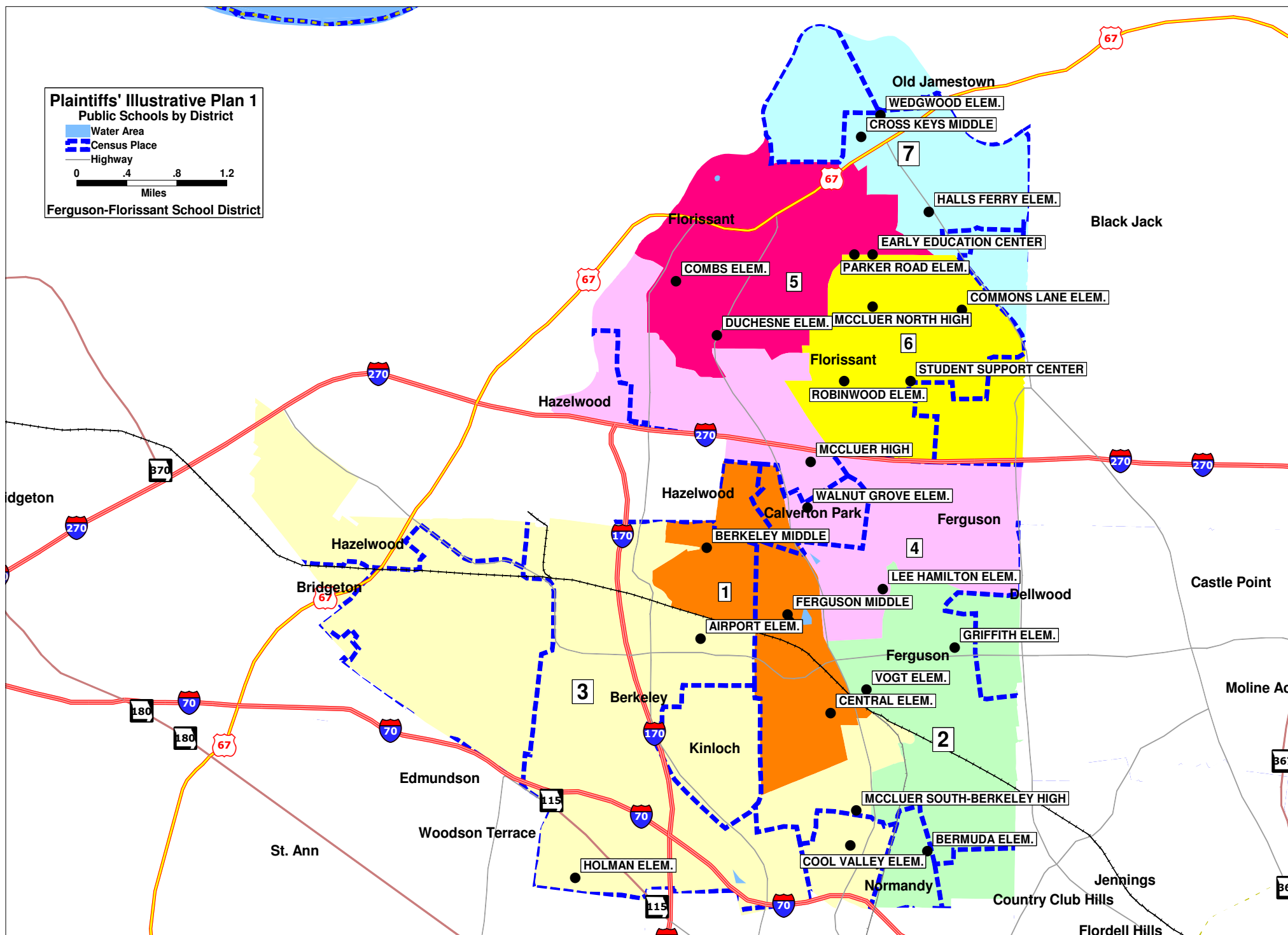
District	Population	Deviation	% Deviation	Black	% Black	AP Black	% AP Black	Hispanic	% Hispanic	NH White	% NH White
1	9841	32	0.33%	6852	69.63%	7005	71.18%	161	1.64%	2596	26.38%
2	10025	216	2.20%	6653	66.36%	6807	67.90%	131	1.31%	2952	29.45%
3	9923	114	1.16%	7704	77.64%	7852	79.13%	312	3.14%	1692	17.05%
4	9321	-488	-4.98%	2843	30.50%	2979	31.96%	192	2.06%	6010	64.48%
5	9997	188	1.92%	2032	20.33%	2165	21.66%	201	2.01%	7513	75.15%
6	9980	171	1.74%	4396	44.05%	4583	45.92%	180	1.80%	5111	51.21%
7	9576	-233	-2.38%	5380	56.18%	5576	58.23%	147	1.54%	3707	38.71%
Total	68663		7.18%	35860	52.23%	36967	53.84%	1324	1.93%	29581	43.08%

District	18+_Pop	18+ Black	% 18+ Black	18+ AP Black	% 18+ AP Black	18+ Hisp.	% 18+ Hisp.	18+_NH White	% 18+ NH White
1	6918	4423	63.93%	4492	64.93%	99	1.43%	2261	32.68%
2	7071	4310	60.95%	4364	61.72%	81	1.15%	2528	35.75%
3	6984	5193	74.36%	5260	75.32%	188	2.69%	1475	21.12%
4	7406	2062	27.84%	2121	28.64%	123	1.66%	5043	68.09%
5	7790	1359	17.45%	1415	18.16%	122	1.57%	6163	79.11%
6	7442	2898	38.94%	2956	39.72%	117	1.57%	4285	57.58%
7	7160	3785	52.86%	3858	53.88%	94	1.31%	3097	43.25%
Total	50771	24030	47.33%	24466	48.19%	824	1.62%	24852	48.95%

District	Group Quarters – Incarcerated	Group Quarters – College Dorms	Group Quarters – Military
1	0	0	0
2	0	0	0
3	0	0	0
4	0	0	0
5	0	0	0
6	4	190	0
7	0	0	0
Total	4	190	0

Group quarters data are from the 2010 Advance Group Quarters File released by the Census Bureau on April 20, 2011





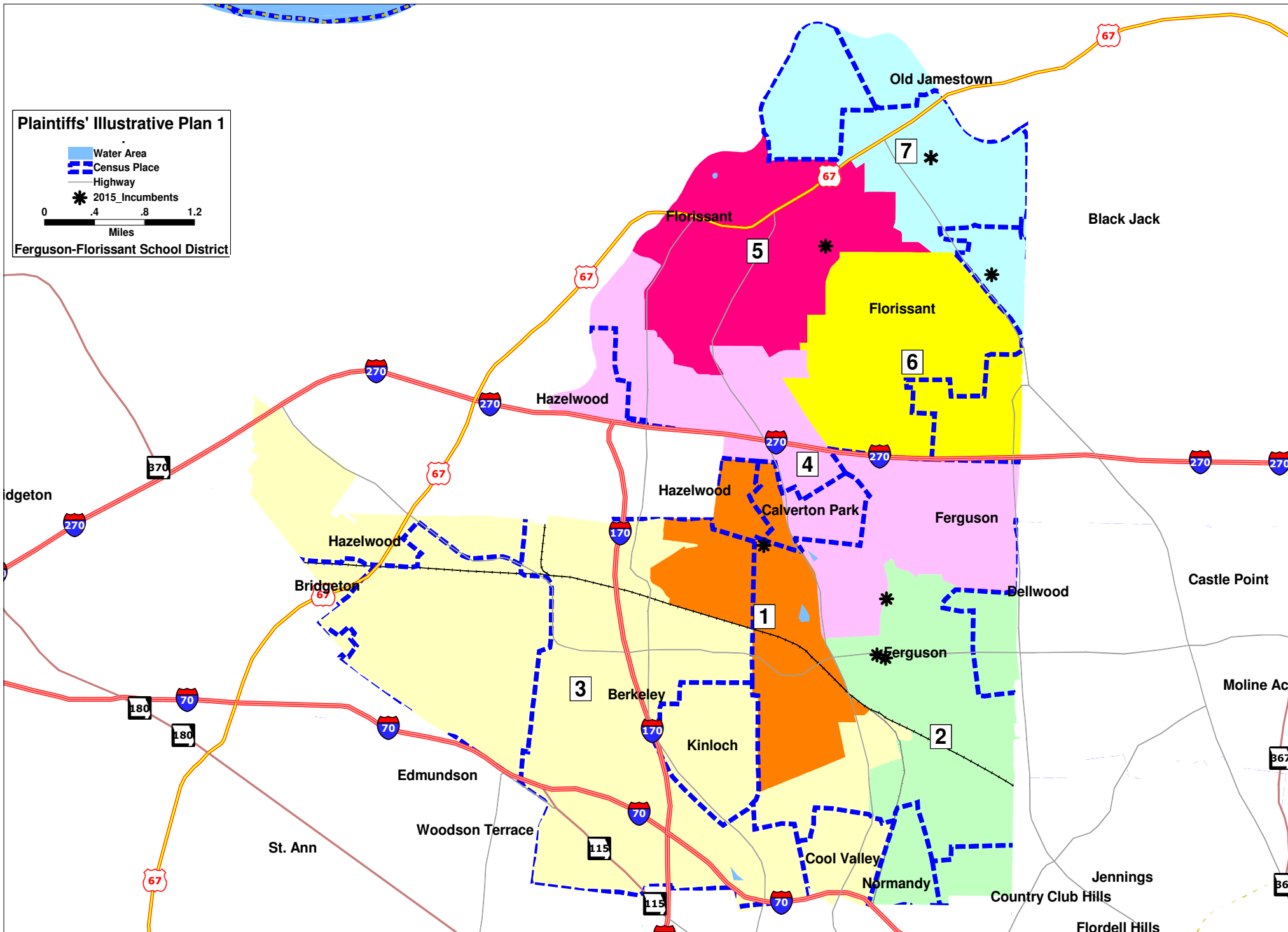
Plaintiffs' Illustrative Plan 1 -- Public Schools by District

School Name	2010-2011 Enrollment	Illustrative Plan 1 District Assignment
BERKELEY MIDDLE	305	1
CENTRAL ELEM.	291	1
FERGUSON MIDDLE	583	1
JOHNSON WABASH ELEM.	410	1
BERMUDA ELEM.	279	2
GRIFFITH ELEM.	371	2
VOGT ELEM.	268	2
AIRPORT ELEM.	302	3
COOL VALLEY ELEM.	246	3
HOLMAN ELEM.	216	3
MCCLUER SOUTH-BERKELEY HIGH	646	3
LEE HAMILTON ELEM.	311	4
MCCLUER HIGH	1394	4
WALNUT GROVE ELEM.	424	4
COMBS ELEM.	348	5
DUCHESNE ELEM.	418	5
EARLY EDUCATION CENTER	546	6
PARKER ROAD ELEM.	378	6
COMMONS LANE ELEM.	464	6
MCCLUER NORTH HIGH	1827	6
ROBINWOOD ELEM.	409	6
STUDENT SUPPORT CENTER	0	6
CROSS KEYS MIDDLE	789	7
HALLS FERRY ELEM.	367	7
WEDGWOOD ELEM.	644	7

Source for School Location Shapefile and Data:

National Center for Education Statistics

<http://nces.ed.gov/surveys/sdds/ed/index.asp>

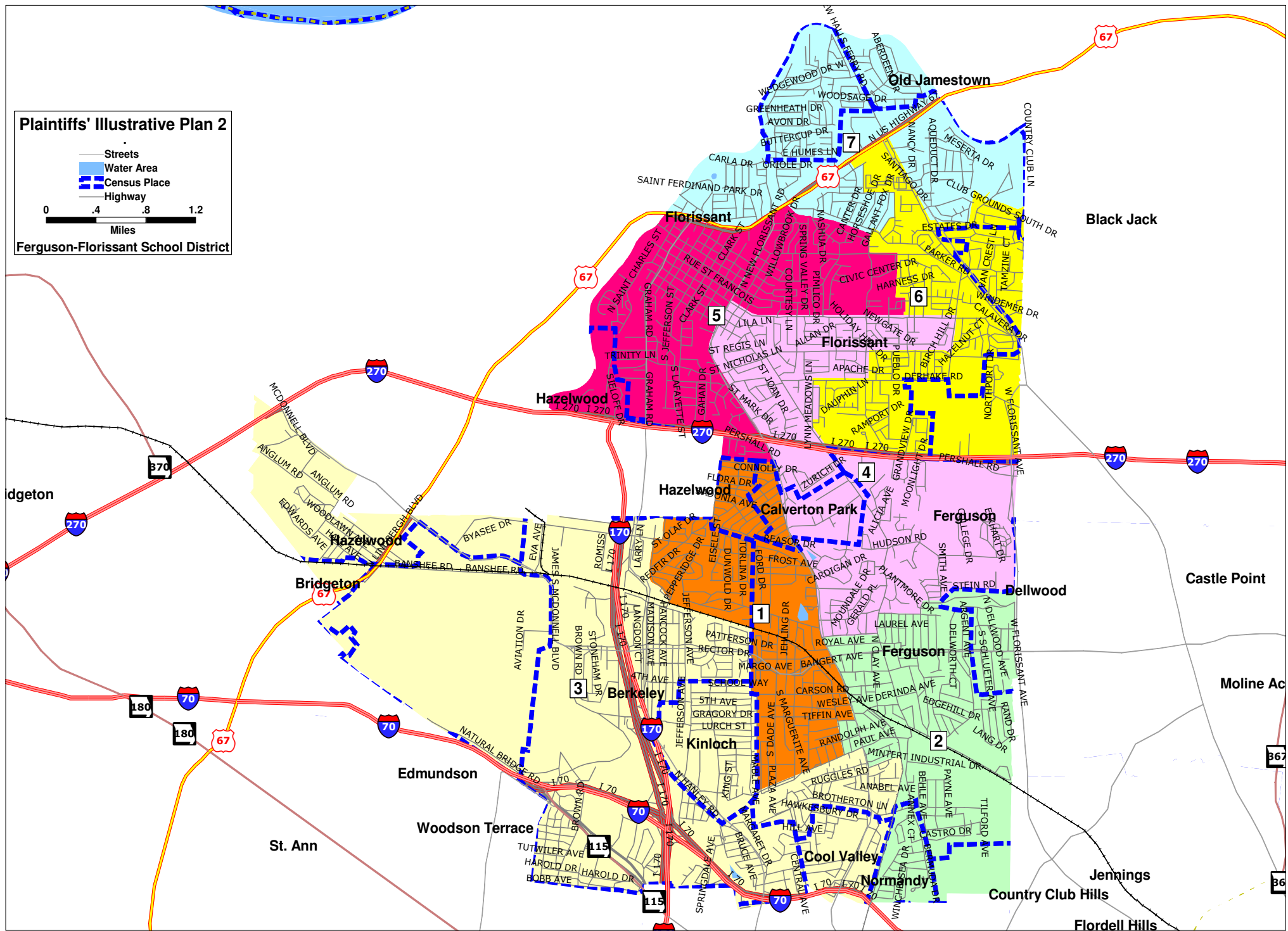
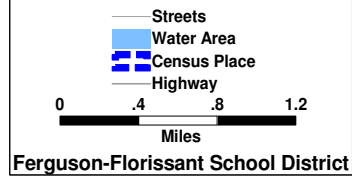


Incumbent Assignments -- Plaintiffs' Illustrative Plan 1

NAME	ADDRESS	CITY	STATE	ZIP	District
Leslie Suzanne Hogshead	975 Buckeye Drive	Ferguson	MO	63135	1
Keith A. Brown	410 Hereford Ave.	Ferguson	MO	63135	2
Robert Chabot	149 N. Elizabeth Ave.	Ferguson	MO	63135	2
Paul T. Morris	510 Larkin Ave	Ferguson	MO	63135	2
Brian Scott Ebert	1360 Hialeah Place	Florissant	MO	63033	5
Courtney Michelle Graves	2075 Aqueduct Dr	Florissant	MO	63033-2861	7
Donna Thurman	12959 Eadstone Ln	Florissant	MO	63033-4020	7

Reock Measures of Compactness – Plaintiffs’ Illustrative Plan 1

DISTRICT	Reock
1	0.35
2	0.44
3	0.29
4	0.26
5	0.54
6	0.66
7	0.34
8	0.39
Sum	N/A
Min	0.26
Max	0.66
Mean	0.41
Std. Dev.	0.13



Population Summary Report

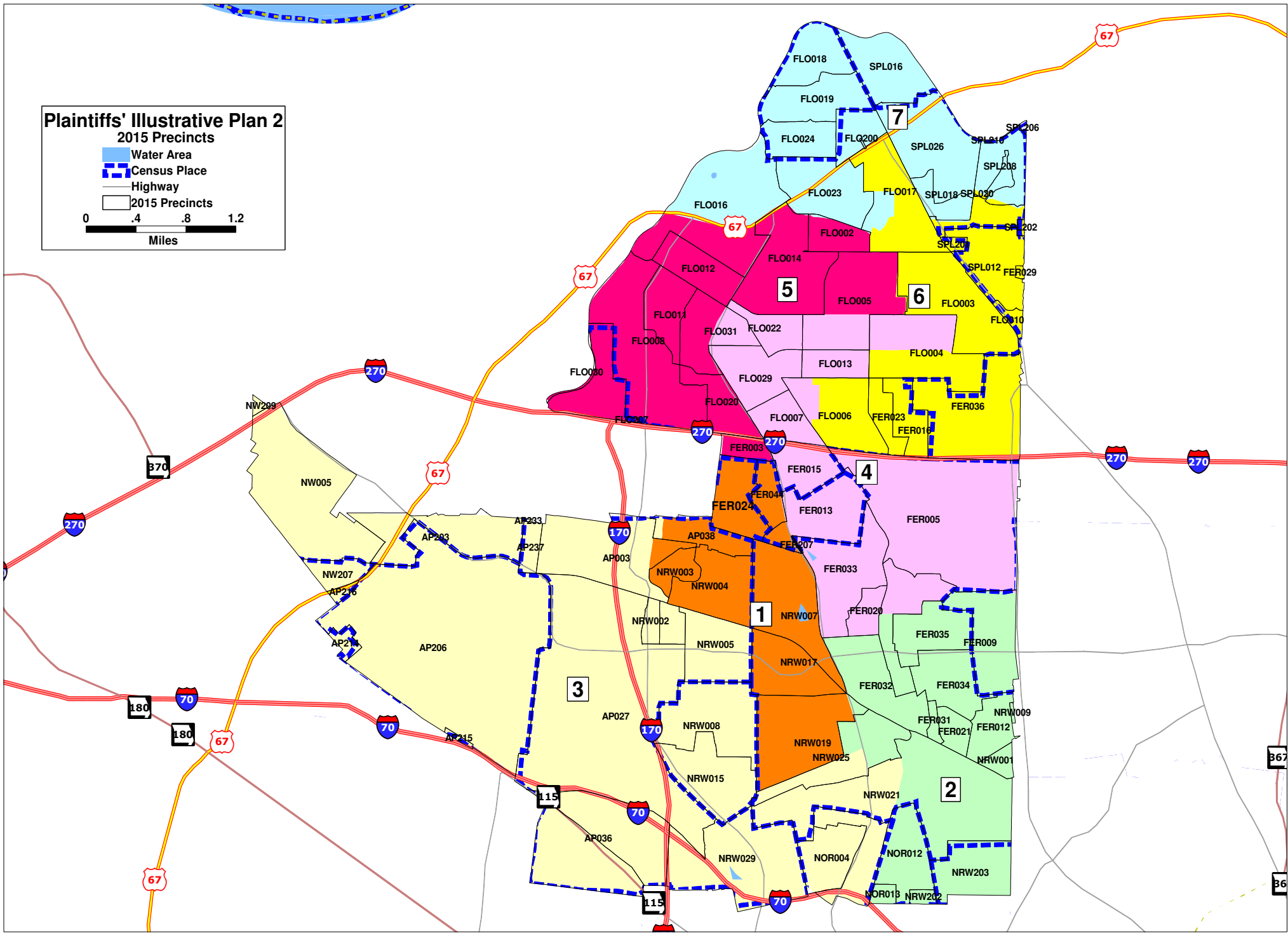
Ferguson-Florissant School District, MO – Plaintiffs Illustrative Plan 2

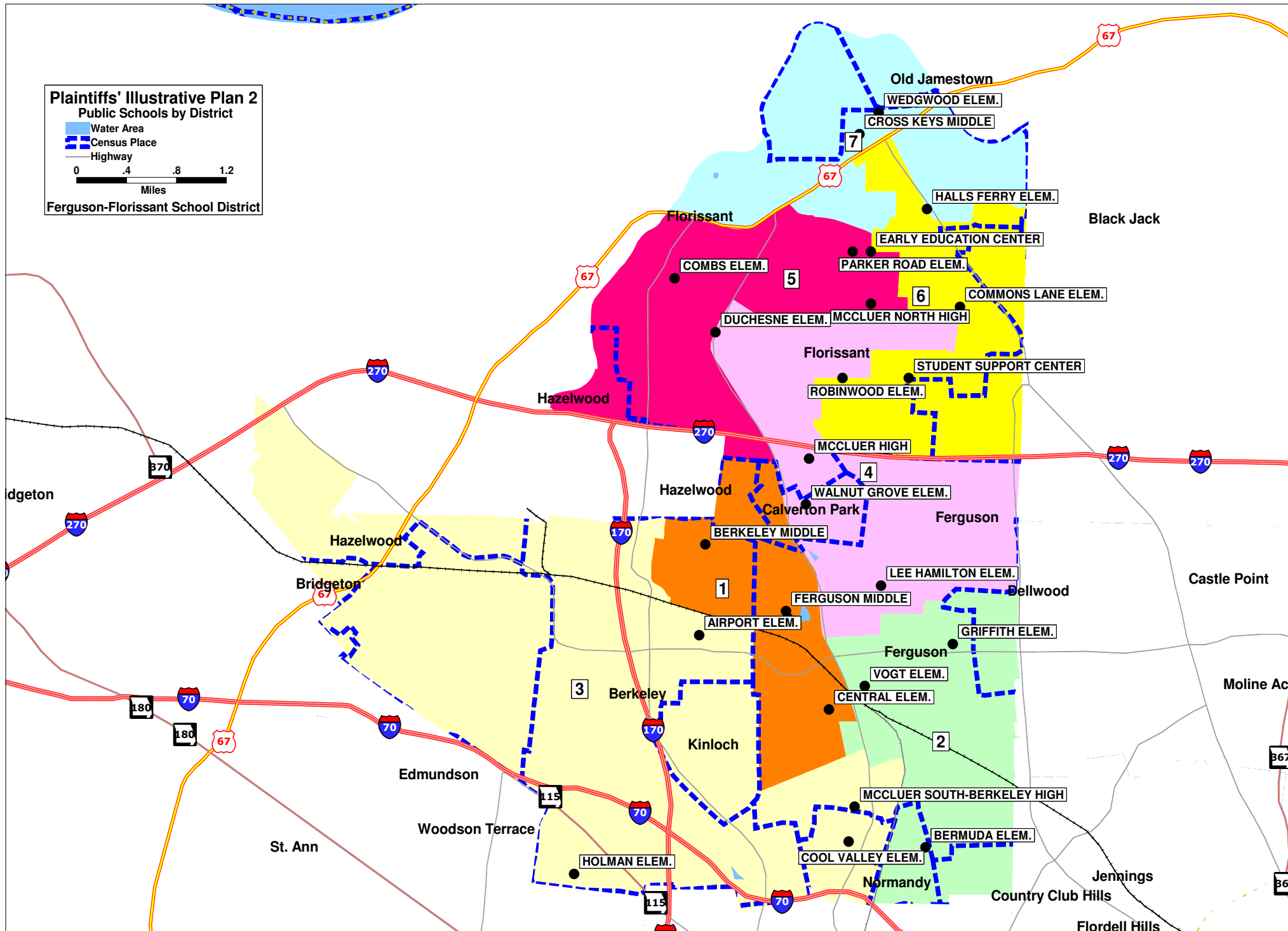
District	Population	Deviation	% Deviation	Black	% Black	AP Black	% AP Black	Hispanic	% Hispanic	NH White	% NH White
1	10020	211	2.15%	7029	70.15%	7183	71.69%	163	1.63%	2594	25.89%
2	9494	-315	-3.21%	6310	66.46%	6439	67.82%	124	1.31%	2808	29.58%
3	9736	-73	-0.74%	7658	78.66%	7819	80.31%	306	3.14%	1548	15.90%
4	9755	-54	-0.55%	3034	31.10%	3198	32.78%	203	2.08%	6267	64.24%
5	10232	423	4.31%	2067	20.20%	2184	21.34%	211	2.06%	7670	74.96%
6	9620	-189	-1.93%	5359	55.71%	5523	57.41%	125	1.30%	3838	39.90%
7	9806	-3	-0.03%	4403	44.90%	4621	47.12%	192	1.96%	4856	49.52%
Total	68663		7.52%	35860	52.23%	36967	53.84%	1324	1.93%	29581	43.08%

District	18+_Pop	18+ Black	% 18+ Black	18+ AP Black	% 18+ AP Black	18+ Hisp.	% 18+ Hisp.	18+_NH White	% 18+ NH White
1	7039	4542	64.53%	4612	65.52%	100	1.42%	2259	32.09%
2	6688	4072	60.89%	4121	61.62%	74	1.11%	2401	35.90%
3	6816	5158	75.67%	5227	76.69%	185	2.71%	1347	19.76%
4	7671	2157	28.12%	2215	28.87%	136	1.77%	5243	68.35%
5	8008	1395	17.42%	1446	18.06%	117	1.46%	6316	78.87%
6	7149	3682	51.50%	3737	52.27%	81	1.13%	3227	45.14%
7	7400	3024	40.86%	3108	42.00%	131	1.77%	4059	54.85%
Total	50771	24030	47.33%	24466	48.19%	824	1.62%	24852	48.95%

District	Group Quarters – Incarcerated	Group Quarters – College Dorms	Group Quarters – Military
1	0	0	0
2	0	0	0
3	0	0	0
4	4	0	0
5	0	0	0
6	0	190	0
7	0	0	0
Total	4	190	0

Group quarters data are from the 2010 Advance Group Quarters File released by the Census Bureau on April 20, 2011





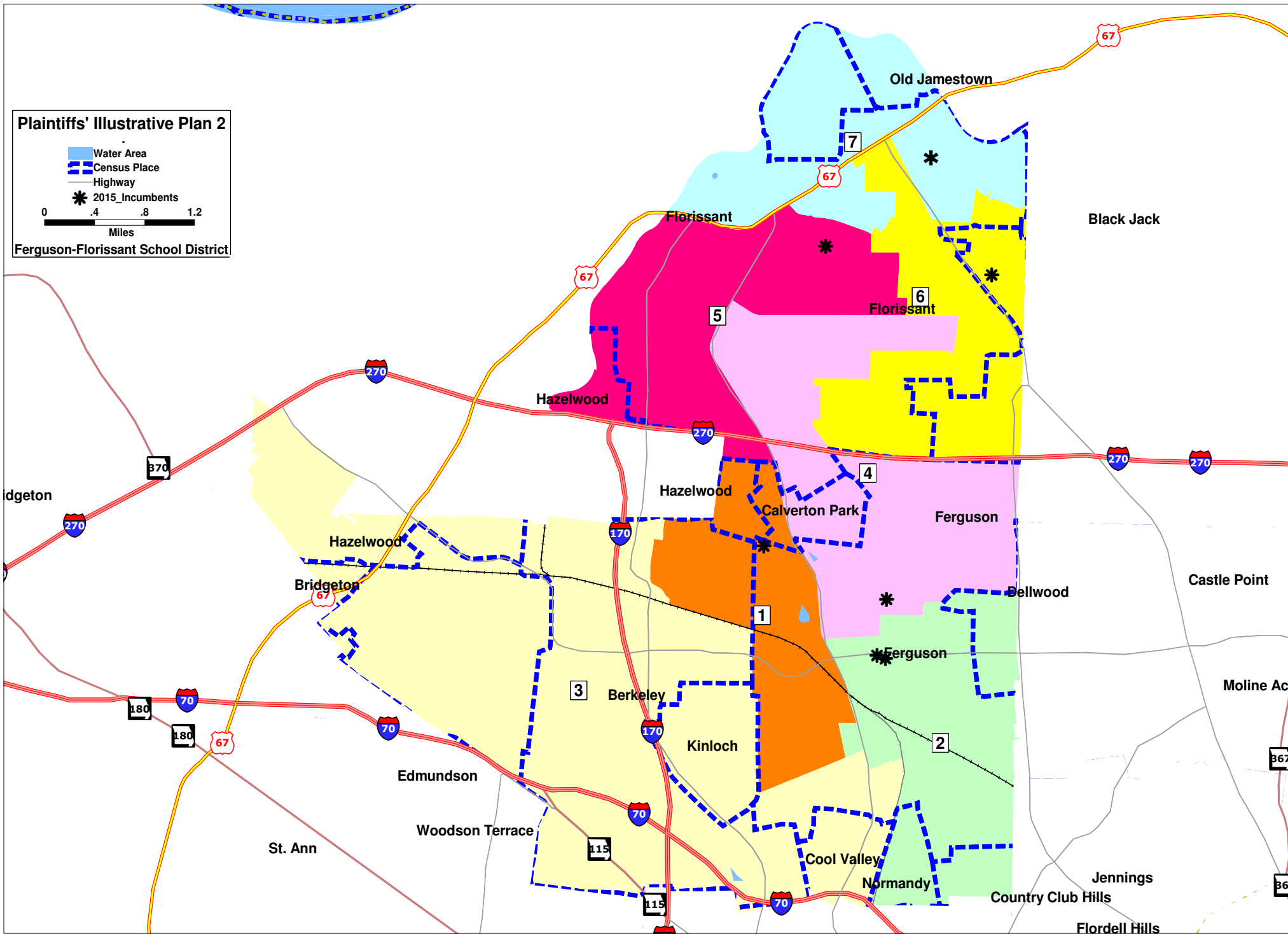
Plaintiffs' Illustrative Plan 2 -- Public Schools by District

School Name	2010-2011 Enrollment	Illustrative Plan 2 District Assignment
BERKELEY MIDDLE	305	1
CENTRAL ELEM.	291	1
FERGUSON MIDDLE	583	1
JOHNSON WABASH ELEM.	410	1
BERMUDA ELEM.	279	2
GRIFFITH ELEM.	371	2
VOGT ELEM.	268	2
AIRPORT ELEM.	302	3
COOL VALLEY ELEM.	246	3
HOLMAN ELEM.	216	3
MCCLUER SOUTH-BERKELEY HIGH	646	3
DUCHESNE ELEM.	418	4
LEE HAMILTON ELEM.	311	4
MCCLUER HIGH	1394	4
WALNUT GROVE ELEM.	424	4
COMBS ELEM.	348	5
EARLY EDUCATION CENTER	546	5
MCCLUER NORTH HIGH	1827	5
PARKER ROAD ELEM.	378	5
COMMONS LANE ELEM.	464	6
HALLS FERRY ELEM.	367	6
ROBINWOOD ELEM.	409	6
STUDENT SUPPORT CENTER	0	6
CROSS KEYS MIDDLE	789	7
WEDGWOOD ELEM.	644	7

Source for School Location Shapefile and Data:

National Center for Education Statistics

<http://nces.ed.gov/surveys/sdds/ed/index.asp>



Incumbent Assignments -- Plaintiffs' Illustrative Plan 2

NAME	ADDRESS	CITY	STATE	ZIP	District
Leslie Suzanne Hogshead	975 Buckeye Drive	Ferguson	MO	63135	1
Keith A. Brown	410 Hereford Ave.	Ferguson	MO	63135	2
Robert Chabot	149 N. Elizabeth Ave.	Ferguson	MO	63135	2
Paul T. Morris	510 Larkin Ave	Ferguson	MO	63135	4
Brian Scott Ebert	1360 Hialeah Place	Florissant	MO	63033	5
Donna Thurman	12959 Eadstone Ln	Florissant	MO	63033-4020	6
Courtney Michelle Graves	2075 Aqueduct Dr	Florissant	MO	63033-2861	7

Reock Measures of Compactness – Plaintiffs’ Illustrative Plan 2

DISTRICT	Reock
1	0.36
2	0.46
3	0.29
4	0.40
5	0.37
6	0.39
7	0.38
Sum	N/A
Min	0.29
Max	0.46
Mean	0.38
Std. Dev.	0.05
